



WILL COUNTY, ILLINOIS

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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LONERGAN
ASSOCIATES
INCORPORATED

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Urban County of Will County, Illinois

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1. Introduction

A. Introduction to the Analysis of Impediments

The Urban County of Will County has prepared an Analysis of Impediments to Fair Housing Choice to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the Urban County is charged with the responsibility of conducting its CDBG programs in compliance with the federal Fair Housing Act. Additionally, the Urban County receives HOME program funds from HUD, which broadens the County's obligation to affirmatively further fair housing. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including local units of government that receive federal funds through Will County.

Entitlement communities receiving CDBG and/or HOME entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act. These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, sex, disability, familial status or national origin. In addition, HUD issued a Final Rule on February 3, 2012, that prohibits entitlement communities from discriminating on the basis of actual or perceived sexual orientation, gender identity or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings

- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As a federal entitlement community, the Urban County has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions or decisions that restrict or have the effect of restricting the availability of housing choices, based on race, color, religion, sex, disability, familial status or national origin.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership and resources for future fair housing planning.

The Analysis will serve as a point-in-time baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

C. The Federal Fair Housing Act

1. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

2. What does the Fair Housing Act prohibit?

a. In the sale and rental of housing

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

b. In mortgage lending

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

c. Other prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability,

familial status, or national origin. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

3. Additional Protections for People with Disabilities

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

4. Housing Opportunities for Families with Children

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

5. Recent Changes to HUD Program Regulations

As of a Final Rule effective March 5, 2012, HUD implemented policy with the intention of ensuring that its core programs are open to all eligible individuals

and families regardless of sexual orientation, gender identity or marital status. In response to evidence suggesting that lesbian, gay, bisexual and transgender individuals and families were being arbitrarily excluded from housing opportunities in the private sector, HUD's aim was to ensure that its own programs do not allow for discrimination against any eligible person or household, and that HUD's own programs serve as models for equal housing opportunity.

This change to HUD program regulations does not amend the Fair Housing Act to prohibit all discrimination in the private market on the basis of sexual orientation, gender identity or marital status. However, it prohibits discrimination of those types by any housing provider who receives HUD funding, including public housing agencies, those who are insured by the Federal Housing Administration, including lenders, and those who participate in federal entitlement grant programs through HUD.

D. The Illinois Human Rights Act

The Illinois Human Rights Act prohibits discrimination in the area of real estate transactions based on race, color, religion, sex, national origin, ancestry, age, marital status, familial status, physical or mental disability, military status, sexual orientation, unfavorable discharge from military service, or persons with an order of protection. Consequently, persons residing in Illinois have more protection under State law than under federal law in the area of housing discrimination.

Under the Illinois Human Rights Act, real estate transactions include the sale, exchange, rental or lease of real property, the brokering or appraising of residential real property, and the making or purchasing of loans or providing other financial assistance for purchasing, constructing, improving, repairing or maintaining a dwelling or secured by residential real estate.

The Illinois Human Rights Act (HRA) has been determined by HUD to be substantially equivalent to the federal Fair Housing Act. This means that the Illinois HRA provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD will refer complaints of housing discrimination that it receives from Illinois to the Illinois Department of Human Rights for investigation.

The Illinois Department of Human Rights (IDHR) is the state agency responsible for enforcing the Illinois HRA. IDHR accepts and processes complaints of housing discrimination, and conducts an investigation of the charges. If substantial evidence of a violation of the Illinois HRA is found, IDHR will attempt to resolve the dispute through settlement discussions. Should conciliation fail, IDHR will file a complaint with the Illinois Human Rights Commission (HRC). Parties may also elect to have their claims decided in a circuit court of Illinois. If the complaint remains with the Illinois HRC, the case is scheduled for a public hearing before an administrative law judge.

The Illinois HRC is authorized under the Illinois HRA and provides a neutral forum for resolving complaints of discrimination filed under the Illinois HRA. The primary responsibility of the HRC is to make impartial determinations of whether there has been unlawful discrimination as defined by the Illinois HRA. The HRC fights discrimination by investigating and resolving complaints through reconciliation by mediators and conciliators, and conducting a multi-faceted public education program.

The following chart lists the protected classes under federal and state laws related to fair housing.

Figure 1-1

Comparison of Statutory Protections against Housing Discrimination

| Protected Class | Federal Fair Housing Act | Illinois Human Rights Act |
|---|--------------------------|---------------------------|
| Race | • | • |
| Color | • | • |
| National Origin | • | • |
| Religion | • | • |
| Sex | • | • |
| Familial Status (families with children under age 18) | • | • |
| Handicap/Disability Status | • | • |
| Ancestry | | • |
| Age | | • |
| Marital Status | | • |
| Military/Veteran Status | | • |
| Sexual Orientation | | • |
| Unfavorable Discharge from Military Service | | • |
| Persons with an Order of Protection | | • |

E. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

1. Fair Housing Act

In buildings that are ready for first occupancy after March 13, 1991 and include four or more units:

- There must be an accessible entrance on an accessible route.
- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All ground floor units and all units in elevator buildings must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats and other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars, and
 - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

2. Americans with Disabilities Act (ADA)

Title II of the ADA applies to state and local services, including state and local housing programs. Government entities are obliged to assure that housing financed through state and local programs complies with ADA

accessibility guidelines. A complete description of the guidelines can be found at www.ada.gov/stdspdf.htm.

3. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by people with motor and sensory disabilities for Federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov/ufas/ufas-html/ufas.htm.

4. Visitability Standards

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor big enough to get into in a wheelchair, and close the door.

5. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

F. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair Housing Choice. M&L utilized a comprehensive approach to complete the Analysis involving the Urban County of Will County. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes

- Consolidated Plans, Annual Plans and CAPERs for the Urban County
- The 2005 Analysis of Impediments to Fair Housing Choice for Will County
- Fair housing complaints filed with HUD and the Illinois Human Rights Commission
- Real estate advertisements from area newspapers of record
- Residential segregation data available from Census Scope
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

1. Urban County Definition

Throughout this report, emphasis is placed on the Urban County rather than on the entire County of Will County. The Urban County of Will County includes all of the geographic area within Will County exclusive of the Municipalities of Aurora, Joliet and Naperville, which are HUD CDBG entitlement communities in their own right and are responsible for preparing their own individual *Analysis of Impediments to Fair Housing Choice*.

The Urban County does not include Diamond, Lemont, Orland Park, Park Forest, Steger, Tinley Park and Woodridge, which have opted out of the Urban County program.

G. Use and Presentation of Data

Because statistics in census data products are based on the collection, tabulation, editing and handling of questionnaires, errors in the data are possible. In addition to errors occurring during data collection, some of the census data is American Community Survey sample data rather than Summary File 1 (SF1) data, which is 100-percent data. Each data set is subject to sampling error and non-sampling error, respectively. Non-sampling error includes confidentiality edits applied by the Census Bureau to assure that data does not disclose information about specific individuals, households or housing units. Because of sampling and non-sampling errors, there may be discrepancies in the reporting of similar type of data. These discrepancies do not negate the usefulness of the census data.

In all cases, the latest available data was used to describe the most appropriate geographic unit of analysis. For variables or geographies for which 2010 Census data was unavailable for incorporation into the AI, 2006-2010 American Community Survey estimates were used. For variables or geographies where estimates were unavailable or unreliable, 2000 Census data was used.

For the convenience of the reader, demographic and housing data included in this report are presented for:

- The Urban County, which encompasses the 28 municipalities and 24 townships that are eligible to receive annual funding from the Urban County's CDBG entitlement grant award,
- Urban County opt-out communities (Diamond, Lemont, Orland Park, Park Forest, Steger, Tinley Park and Woodridge),
- Entitlement communities, which includes the three municipalities that participate in their own right under the CDBG program (Aurora, Joliet and Naperville), and
- Will County in its entirety.

These geographic distinctions are illustrated in Map 1-1 on the following page.

H. Development of the AI

1. Lead Agency

The Will County Land Use Department was the lead agency for the preparation and implementation of the AI. Staff members identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

2. Agency Consultation

The County engaged in an extensive consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were mailed to many of the interviewees and detailed lists of issues were developed for the focus group sessions and interviews.

From October 1st through October 3rd, 2012, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations and their clients. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

I. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In Illinois, this protection is also specifically extended to persons based on ancestry, age, marital status, military/veteran status, sexual orientation, unfavorable discharge from military service and persons with an order of protection. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in towns and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes well beyond an analysis of the adequacy of affordable housing in Will County. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.

2. Demographic Information

A. Demographic Profile

1. Population Trends

State Growth

Located in the Chicago metropolitan area, Will County has recently experienced substantial population growth from new suburban housing construction. Between 2000 and 2010, Will County was the 4th largest County in the State of Illinois. It also was the fastest growing County of the state's top 15 largest counties and the 2nd fastest growing County in the entire state, having grown 34.9% in the past decade.

Regional Growth

While Cook County—including Chicago—commanded the region's population with more than five million inhabitants, it lost 3.4% of its population in the past decade. The ring of suburban counties surrounding Cook, called 'collar counties', including Will County as well as DuPage, Kane, McHenry and Lake Counties, all experienced population growth, with Will County leading that growth. While Cook County and Chicago remain the region's economic center, population increasingly is growing at the metropolitan region's suburban fringe.

History of Growth

Growth in Will County has been substantial since 1970, seeing double-digit gains every decade. This continued growth has fueled new home construction and has encouraged municipalities such as Braceville to annex land in Will County for the first time. Goodings Grove, an unincorporated area in 2000, officially became Homer Glen Village by 2010. The continual population growth has also led to continued annexation.

Urban County Growth

The Urban County portion of Will County includes the unincorporated townships and those municipalities opting into the County's program (all municipalities except for Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park and Woodridge). The Urban County consists of 464,620 residents while Will County as a whole consists of 677,560 residents. As such, the Urban County comprises 68.6% of the total County population. It has also been growing at a rate similar to the whole County, having grown 34.7% in the past decade compared to the County's total growth rate of 34.9%.

Figure 2-1
Population Trends, 1970-2010

| | 1970 | 1980 | 10-Year Change | 1990 | 10-Year Change | 2000 | 10-Year Change | 2010 | 10-Year Change | % Change 1970 - 2010 |
|---------------------------|------------|------------|-------------------|------------|-------------------|----------------|-------------------|----------------|-------------------|-------------------------|
| Urban Will County* | ** | ** | | ** | | 344,960 | | 464,620 | 34.7% | |
| Total Will County | 249,498 | 324,460 | 30.0% | 357,313 | 10.1% | 502,266 | 40.6% | 677,560 | 34.9% | 171.6% |
| State of Illinois | 11,113,976 | 11,426,518 | 2.8% | 11,430,602 | 0.0% | 12,419,293 | 8.6% | 12,830,632 | 3.3% | 15.4% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

** Urban County population data for years 1970-1990 is unavailable

Source: U.S. Census Bureau, Census 2000 (SF1, P1), Census 2010 (SF1, P1), Census Quickfacts Population 1900-1990

Growth by Jurisdiction

While the Urban County and Will County have grown at relatively consistent rates, within the County boundaries, some communities have grown significantly faster than others. Orland Park Village, a community with only 6 people in Will County in 2000, has annexed further into the County and grown to 184 people. Even larger numerical gains can be seen in Aurora, Tinley Park and Plainfield which each experienced greater than a 100% increase in population within Will County and numerical gains of 8,516, 4,953, and 24,464 people, respectively. As the fastest growing unincorporated area, Green Garden Township gained 1,416 residents in the past decade.

Generally, the largest population gains occurred in northern areas of the County and in cities while townships were more likely to see population declines. This trend is largely due to the population shifts that result from annexation, rather than in- and out-migration. The map on the following page illustrates these changes.

Figure 2-2
Population Change by Jurisdiction, 2000-2010

| Jurisdiction | 2000 | 2010 | Change | Jurisdiction | 2000 | 2010 | Change |
|-----------------------|----------------|----------------|--------------|----------------------------|----------------|----------------|--------------|
| Orland Park Village** | 6 | 184 | 2966.7% | University Park Village | 6,660 | 6,856 | 2.9% |
| Aurora City* | 2,955 | 11,471 | 288.2% | Florence Township | 464 | 477 | 2.8% |
| Tinley Park Village** | 2,514 | 7,467 | 197.0% | Park Forest Village** | 3,214 | 3,303 | 2.8% |
| Plainfield Village | 13,038 | 37,502 | 187.6% | Wilton Township | 819 | 841 | 2.7% |
| Beecher Village | 2,033 | 4,359 | 114.4% | Will Township | 1,196 | 1,218 | 1.8% |
| Manhattan Village | 3,330 | 7,051 | 111.7% | Lockport Township | 10,794 | 10,954 | 1.5% |
| Shorewood Village | 7,686 | 15,615 | 103.2% | Godley Village | 545 | 552 | 1.3% |
| Diamond Village** | 10 | 19 | 90.0% | Plainfield Township | 13,317 | 13,488 | 1.3% |
| Romeoville Village | 21,153 | 39,680 | 87.6% | New Lenox Township | 10,707 | 10,787 | 0.7% |
| Monee Village | 2,924 | 5,148 | 76.1% | Washington Township | 1,915 | 1,904 | -0.6% |
| Frankfort Village | 10,391 | 17,782 | 71.1% | Custer Township | 1,406 | 1,379 | -1.9% |
| Lockport City | 15,191 | 24,839 | 63.5% | Joliet Township | 13,051 | 12,754 | -2.3% |
| Crest Hill City**** | 13,329 | 20,837 | 56.3% | Wheatland Township | 5,825 | 5,665 | -2.7% |
| Green Garden Township | 2,556 | 3,972 | 55.4% | Steger Village** | 5,636 | 5,467 | -3.0% |
| Homer Glen Village | 17,084 | 24,220 | 41.8% | Peotone Township | 925 | 892 | -3.6% |
| Elwood Village | 1,620 | 2,279 | 40.7% | Manhattan Township | 2,285 | 2,159 | -5.5% |
| New Lenox Village | 17,771 | 24,394 | 37.3% | Troy Township | 3883 | 3582 | -7.8% |
| Bolingbrook Village | 54,573 | 71,795 | 31.6% | Crete Township | 9,422 | 8,637 | -8.3% |
| Joliet City* | 105,597 | 137,684 | 30.4% | Jackson Township | 1894 | 1669 | -11.9% |
| Minooka Village | 1388 | 1803 | 29.9% | Wilmington Township | 1,053 | 918 | -12.8% |
| Channahon Village | 7,235 | 9,345 | 29.2% | Wesley Township | 2,558 | 2,203 | -13.9% |
| Mokena Village | 14,583 | 18,740 | 28.5% | Symerton Village | 106 | 87 | -17.9% |
| Naperville City* | 37,374 | 47,320 | 26.6% | Channahon Township | 1,157 | 783 | -32.3% |
| Peotone Village | 3,385 | 4,142 | 22.4% | Reed Township | 295 | 192 | -34.9% |
| Braidwood City | 5,203 | 6,191 | 19.0% | Homer Township | 8796 | 3304 | -62.4% |
| Crete Village | 7,346 | 8,259 | 12.4% | Woodridge Village** | 0 | 22 | - |
| Wilmington City | 5,134 | 5,724 | 11.5% | Lemont Village** | 0 | 3 | - |
| Du Page Township | 1,492 | 1,605 | 7.6% | Coal City Village | 0 | 2 | - |
| Monee Township | 1,681 | 1,765 | 5.0% | Braceville Village | 0 | 1 | - |
| Rockdale Village | 1,888 | 1,976 | 4.7% | Matteson Village | 0 | 0 | - |
| Frankfort Township | 13,873 | 14,293 | 3.0% | Sauk Village | 0 | 0 | - |
| Will County | 502,266 | 677,560 | 34.9% | Urban Will County † | 344,960 | 464,620 | 34.7% |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Homer Glen incorporated in 2001. Its change in population is compared to Goodings Grove, a similar Census Designated Place

*** Crest Hill's population includes the institutionalized population at Stateville Prison, which numbered approximately 3,160 in 2010 and 2,690 in 2000.

† Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, Census 2000 (SF1, P1), Census 2010 Redistricting Data



Population growth in Will County continues to significantly outpace statewide averages.

2. Racial and Ethnic Trends

Increasing Racial Diversity

Within the context of Will County's rapid growth, the racial composition of the County's population has changed dramatically. The White population of Will County increased 24.8% in the last decade, while the White population of the Urban County increased 25.2%. Comparatively, non-White populations increased 78.5% in Will County and 92.4% in the Urban County. This increasing diversity includes large growth in the Asian population, with increases of 177.2% in Will County and 176.6% in the Urban County. While the growth of Asian populations has happened quickly, the Asian population still remains small compared to other racial groups.

Will County's increasing diversity reflects national trends of minority population growth; however, this is a change from past suburban growth which was largely dominated by White flight from the cities.

Figure 2-3

Racial and Ethnic Population Composition, 2000-2010

| | 2000 | | 2010 | |
|---------------------------|----------------|---------------|----------------|---------------|
| | # | % | # | % |
| Urban Will County* | 344,960 | 100.0% | 464,620 | 100.0% |
| White | 294,487 | 85.4% | 367,501 | 79.1% |
| Non-White | 50,473 | 14.6% | 97,119 | 20.9% |
| Black | 29,794 | 8.6% | 46,565 | 10.0% |
| Asian/Pacific Islander | 6,532 | 1.9% | 18,070 | 3.9% |
| American Indian | 676 | 0.2% | 1,186 | 0.3% |
| Some other race | 8,134 | 2.4% | 21,713 | 4.7% |
| Two or more races | 5,219 | 1.5% | 9,488 | 2.0% |
| Hispanic** | 22,329 | 6.5% | 61,732 | 13.3% |
| Total Will County | 502,266 | 100.0% | 677,560 | 100.0% |
| White | 411,027 | 81.8% | 514,664 | 76.0% |
| Non-White | 91,239 | 18.2% | 162,896 | 24.0% |
| Black | 52,509 | 10.5% | 75,743 | 11.2% |
| Asian/Pacific Islander | 11,125 | 2.2% | 30,833 | 4.6% |
| American Indian | 1,038 | 0.2% | 1,703 | 0.3% |
| Some other race | 18,219 | 3.6% | 39,025 | 5.8% |
| Two or more races | 8,186 | 1.6% | 15,456 | 2.3% |
| Hispanic** | 43,768 | 8.7% | 105,817 | 15.6% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

** Hispanic ethnicity is counted independently of race.

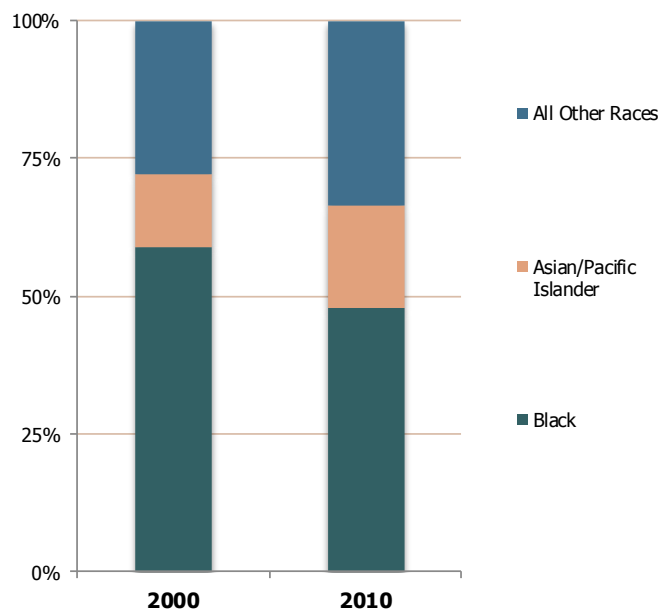
Source: U.S. Census Bureau, Census 2000 Redistricting Data, Census 2010 Redistricting Data

Hispanic Population Growth

The other major population change over the past decade has been the growth in Hispanics. Once a smaller portion of the County's minority population than Blacks, Hispanics now represent a larger percentage than Blacks in both the Urban County and the County as a whole. Growth of the Hispanic population in the Urban County has been 176.5% and 141.8% in Will County. The similar growth trends between the Urban County and the County as a whole show that diversification has taken place in both the more urbanized cities of the County as well as the more suburban townships.

Figure 2-4

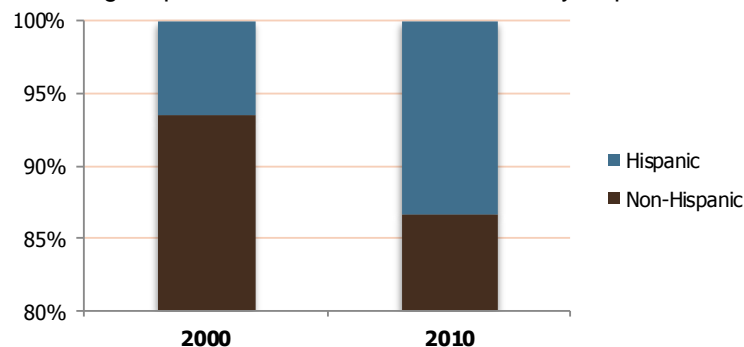
Expansion of Diversity among Racial Minorities, 2000-2010



Source: U.S. Census Bureau, Census 2000 Redistricting Data, Census 2010 Redistricting Data

Figure 2-5

Increasing Hispanic Share of Total Urban County Population, 2000-2010



Source: U.S. Census Bureau, Census 2000 Redistricting Data, Census 2010 Redistricting Data



Racial minorities increased from 14.6% to 20.9% of the Urban County's total population between 2000 and 2010.

Hispanics overtook Blacks as the largest minority group in the Urban County, growing 176.5% over the decade.

3. Areas of Racial and Ethnic Minority Concentration

Defining Racial and Ethnic Concentration

Areas of racial or ethnic concentration are census tracts in which the percentage of a single minority or ethnic group is at least 10 percentage points higher than across the Urban County.

For the purpose of defining areas of racial and ethnic concentration in this AI, this definition was applied using Urban County population totals that exclude federal CDBG entitlements and opt-out communities (Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park and Woodridge). The patchwork of jurisdictions in Will County, as well as the ever-shifting boundaries, necessitated that whole census tracts be used to calculate areas of concentration, despite some areas including portions of opt-out communities. When mapping the areas of concentration, these entitlement and opt-out communities were greyed out to show only those areas of concentration within the Urban County.

Racial and Ethnic Concentration

Across Urban Will County in 2010, Blacks comprised 10.0% of the population. Therefore, an area of Black concentration would include any census tract where the percentage of Black residents is 20.0% or higher. Of the 152 census tracts in all of Will County, 29 meet this criterion. Of those racially concentrated census tracts, 22 have some portion of the tract in the Urban County outside entitlement and opt-out communities. An area of Asian concentration, by the same definition, would include any tract where the percentage of Asian residents is 13.9% or higher. Seven tracts in the whole County, all of which have some portion in the Urban County, meet this criterion. Finally, an area of Hispanic concentration includes any tract where at least 23.3% of all residents are of Hispanic ethnicity. In the whole County, 37 tracts qualify, and 27 tracts with a portion in the Urban County qualify. In total, 47 tracts with some part in the Urban County are racially or ethnically concentrated areas.

The composition of race and ethnicity for the 47 Urban County census tracts is detailed in Figure 2-6 and areas of racial and ethnic concentration are depicted in Map 2-2.

Figure 2-6
Areas of Racial and/or Ethnic Concentration, 2010

| Jurisdiction* | Tract | Population | Race and Ethnicity | | | |
|---------------------|---------|----------------|--------------------|--------------|-------------|--------------|
| | | | White | Black | Asian | Hispanic |
| Urban County | | 464,620 | 79.1% | 10.0% | 3.9% | 13.3% |
| Bolingbrook | 8801.05 | 7,907 | 55.7% | 17.0% | 13.5% | 24.1% |
| Bolingbrook | 8801.06 | 4,508 | 54.9% | 21.2% | 3.1% | 33.4% |
| Bolingbrook | 8801.07 | 5,070 | 51.8% | 23.6% | 6.9% | 28.1% |
| Bolingbrook | 8801.09 | 5,469 | 56.0% | 26.5% | 7.4% | 16.8% |
| Bolingbrook | 8801.11 | 3,742 | 62.4% | 16.0% | 4.7% | 40.1% |
| Bolingbrook | 8801.12 | 2,129 | 60.4% | 12.4% | 9.1% | 33.7% |
| Bolingbrook | 8801.13 | 3,811 | 50.2% | 19.6% | 5.4% | 49.6% |
| Bolingbrook | 8801.14 | 3,107 | 38.8% | 24.7% | 8.9% | 42.4% |
| Bolingbrook | 8801.15 | 3,176 | 46.1% | 27.2% | 4.8% | 33.4% |
| Bolingbrook | 8801.16 | 2,912 | 56.7% | 24.3% | 4.7% | 25.1% |
| Bolingbrook | 8801.17 | 3,365 | 47.2% | 28.4% | 6.8% | 27.3% |
| Bolingbrook | 8801.20 | 9,798 | 53.0% | 19.5% | 19.4% | 14.8% |
| Bolingbrook | 8801.21 | 9,463 | 57.0% | 21.4% | 12.4% | 18.2% |
| Romeoville | 8802.02 | 4,356 | 77.6% | 8.4% | 2.9% | 24.2% |
| Romeoville | 8802.03 | 3,939 | 79.2% | 3.1% | 0.9% | 30.5% |
| Bolingbrook | 8803.06 | 7,894 | 59.7% | 10.0% | 25.5% | 7.8% |
| Wheatland Township | 8803.07 | 6,075 | 65.6% | 8.4% | 21.6% | 6.3% |
| Bolingbrook | 8803.08 | 8,019 | 70.8% | 9.3% | 14.4% | 7.5% |
| Wheatland Township | 8803.09 | 5,340 | 75.7% | 3.6% | 17.4% | 5.1% |
| Wheatland Township | 8803.12 | 9,102 | 71.1% | 4.2% | 21.1% | 3.9% |
| Wheatland Township | 8803.13 | 11,610 | 68.2% | 9.6% | 15.2% | 13.2% |
| Plainfield Township | 8804.08 | 5,103 | 69.4% | 11.2% | 5.1% | 25.6% |
| Romeoville | 8804.10 | 8,609 | 59.9% | 14.0% | 8.8% | 31.8% |
| Plainfield Township | 8804.15 | 7,311 | 72.3% | 7.2% | 6.3% | 25.3% |
| Plainfield Township | 8804.20 | 10,373 | 76.8% | 7.7% | 2.4% | 26.1% |
| Romeoville | 8805.05 | 7,900 | 73.4% | 6.2% | 3.6% | 35.3% |
| Romeoville | 8805.07 | 7,057 | 47.1% | 22.6% | 12.6% | 30.0% |
| Lockport | 8807.02 | 2,795 | 40.8% | 43.9% | 0.4% | 22.7% |
| Joliet Township | 8812 | 4,837 | 25.0% | 59.3% | 0.1% | 26.1% |
| Joliet Township | 8813.02 | 1,818 | 51.0% | 7.1% | 0.5% | 87.0% |
| Joliet Township | 8814.01 | 3,259 | 66.1% | 7.8% | 0.6% | 42.3% |
| Crest Hill | 8816.04 | 2,586 | 54.6% | 34.5% | 2.7% | 14.1% |
| Joliet Township | 8822 | 4,624 | 61.1% | 9.2% | 0.2% | 59.7% |
| Joliet Township | 8823 | 4,259 | 72.8% | 10.5% | 0.4% | 34.8% |
| Joliet Township | 8824 | 3,541 | 33.6% | 43.5% | 0.1% | 49.5% |
| Rockdale | 8829 | 2,361 | 77.2% | 4.5% | 0.5% | 33.5% |
| Joliet Township | 8830 | 3,697 | 51.3% | 37.3% | 0.8% | 22.3% |
| Joliet Township | 8831 | 4,247 | 37.3% | 53.9% | 0.2% | 15.3% |
| Shorewood | 8832.15 | 10,210 | 75.4% | 7.3% | 2.9% | 26.1% |
| University Park | 8836.03 | 2,973 | 38.5% | 55.0% | 0.9% | 7.0% |
| University Park | 8836.05 | 3,082 | 3.4% | 92.5% | 1.6% | 1.8% |
| University Park | 8836.06 | 3,995 | 22.2% | 71.0% | 1.9% | 4.8% |
| Crete Township | 8838.03 | 2,577 | 20.0% | 76.3% | 0.3% | 3.5% |
| Crete Township | 8838.06 | 3,412 | 66.0% | 28.6% | 0.6% | 6.2% |
| Crete | 8838.10 | 3,740 | 52.0% | 42.6% | 1.3% | 5.5% |
| Crest Hill | 8841.03 | 2,776 | 66.8% | 12.2% | 7.4% | 31.6% |
| Crest Hill *** | 9801 | 3,264 | 29.9% | 67.9% | 0.4% | 13.1% |

* Many Census Tracts overlap multiple jurisdictions.

** Federal CDBG entitlement communities

*** Crest Hill's population includes the institutionalized population at Stateville Prison, which numbered approximately 3,160 in 2010 and 2,690 in 2000.

Source: U.S. Census Bureau, Census 2010 (SF1, P1 and P2)



There are 47 areas of racial or minority concentration in the Urban County.

Areas where the definition includes institutional minority concentrations, such as those occurring in correctional facilities, should be considered differently than areas where concentration occurs among the general population.

4. Residential Segregation Patterns

Defining Segregation

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White, suburban communities and low-income, minority, inner-city neighborhoods.

The Effects of Segregation

Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high.¹ Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

Measuring Segregation

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.² The index is typically interpreted as the percentage of a minority population that would have to move in order for a community or neighborhood to achieve full integration.

¹ This aspect of segregation is related to the degree to which members of a group reside in areas where their group predominates, thus leading them to have less residential contact with other groups. See: Fossett, Mark. "Racial Segregation in America: A Nontechnical Review of Residential Segregation in Urban Areas." Department of Sociology and Racial and Ethnic Studies Institute, Texas A&M University, 2004.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum ABS [(b/B)-(a/A)]$, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.



Segregation in Will County

With a 2010 White-Black dissimilarity index of 56.9, the Urban County qualifies as moderately segregated, based on national standards.³ The data indicates that in order to achieve full integration among White and Black residents, 56.9% of Black residents would have to move to another census tract within the County.

Figure 2-7

Will County Dissimilarity Indices, 2010

| | DI with White Population | Population | Share of Total Population |
|------------------------|--------------------------|-----------------|---------------------------|
| White | - | 372,797 | 79.2% |
| Black | 56.9 | 45,479 | 9.7% |
| American Indian | 31.2 | 1,177 | 0.3% |
| Asian/Pacific Islander | 51.8 | 20,182 | 4.3% |
| Other | 50.1 | 21,170 | 4.5% |
| Two or More Races | 28.7 | 9,680 | 2.1% |
| Hispanic** | 37.7 | 61,374 | 13.0% |
| Total | - | 470,485* | 100.0% |

* This population total differs slightly from other Urban County totals because it was calculated by census tracts rather than municipal boundaries.

** Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2010 (SF1, P1 and P2)

In addition to a White-Black index of 56.9, the Urban County has a White-American Indian index of 31.2, White-Asian index of 51.8, a White-other race index of 50.1, a White-multi race index of 28.7 and a White-Hispanic index of 37.7. These numbers indicate that other subpopulations are more integrated than Whites and Blacks within the County. In cases where the subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.



Will County is moderately segregated.

According to dissimilarity index data, 56.9% of Black persons would have to move to a different location in order to achieve full integration.

Changing Patterns of Segregation


Since 2000, the Urban County's Black population has become more integrated, while its rapidly expanding Hispanic, Asian and other race (often correlating to Hispanic) populations are becoming more concentrated and less integrated with Whites.

³ According to Douglas S. Massey, an index under 30 is low, between 30 and 60 is moderate, and above 60 is high. See Massey, "Origins of Economic Disparities: The Historical Role of Housing Segregation," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 41-42.



Figure 2-8

Changes in Racial and Ethnic Integration, 2000-2010

| | Black | | | Asian | | Hispanic | |
|-------------|------------|------|---|------------|------|------------|------|
| | Population | DI | | Population | DI | Population | DI |
| 2000 | 33,602 | 64.8 |  | 9,512 | 46.2 | 23,766 | 33.8 |
| 2010 | 45,479 | 56.9 | | 20,182 | 51.8 | 60,457 | 39.7 |

Source: U.S. Census Bureau, Census 2000 (SF1, P1 and P2) Census 2010 (SF1, P1 and P2); Calculations by Mullin & Lonergan Associates

Segregation in a Regional Context

Among surrounding counties in Illinois, the Urban County has a slightly higher than average rank in terms of Black-White segregation. Figure 2-9 includes year 2010 calculations of dissimilarity. It assigns Will County a lower index than Cook and Kankakee Counties, but a higher index than Kane, DuPage, Grundy and Kendall Counties.

Figure 2-9

Segregation Rankings among Surrounding Counties, 2010

| Rank | | Black Population | White Population | Total Population | DI |
|------|---------------------------------|------------------|------------------|------------------|------|
| 1 | Cook County | 1,287,767 | 2,877,212 | 5,194,675 | 77.9 |
| 2 | Kankakee County | 17,187 | 87,986 | 113,449 | 60.5 |
| 3 | Will County (Urban County only) | 45,479 | 372,797 | 464,620 | 56.9 |
| 4 | Kane County | 29,422 | 384,548 | 515,269 | 43.0 |
| 5 | DuPage County | 42,346 | 714,140 | 916,924 | 37.6 |
| 6 | Grundy County | 605 | 46,933 | 50,063 | 37.1 |
| 7 | Kendall County | 6,585 | 95,891 | 114,736 | 19.5 |

Source: U.S. Census Bureau, Census 2010 (SF1, P1); Calculations by Mullin & Lonergan Associates

5. Race, Ethnicity and Income

County-Wide Median Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or a rental lease. Median household income (MHI) in Will County was \$75,906 in 2010, representing the fifth-highest median income for any County in the state of Illinois, following four other counties in the Chicago area. Will County consistently ranks in the top 100 highest median income counties across the United States.

Median Income and Poverty

Across racial and ethnic groups, Asians had the highest MHI in Will County at \$100,050. The MHI for Whites was \$78,878. Among Black and Hispanic households, MHI was substantially less, at \$52,196 and \$61,708, respectively.

As suggested by the lower median incomes among Blacks and Hispanics, minority residents in Will County experienced poverty at greater rates than White residents. Less than 5% of White residents were living in poverty in

2010, compared with 13.6% of Blacks and 12% of Hispanics. Despite having a significantly higher MHI than Whites, Asians experienced poverty rates of 7.0%, more than three percentage points higher than Whites and above the Will County poverty rate.

Figure 2-10

Median Household Income and Poverty Rates by Race/Ethnicity, 2010

| | Median Household Income | Poverty Rate |
|--------------------|-------------------------|--------------|
| Will County | \$75,906 | 6.6% |
| Whites | \$78,878 | 4.7% |
| Blacks | \$52,196 | 16.3% |
| Asians | \$100,050 | 7.0% |
| Hispanics | \$61,708 | 12.0% |

Note: Five-year sample data was selected because one- and three-year sample data, while available, included an unacceptably high margin of error within smaller racial/ethnic groups.

Source: U.S. Census Bureau, 2006-10 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B, B17001D, B17001I)

Income Distribution

Distribution of household income by race and ethnicity is comparable to the trends described above. A review of household income distribution also shows a disparity between White and non-White households in the Urban County and Will County overall. Among White and Asian residents in the Urban County, more than half (53.1% and 64.6%, respectively) earned more than \$75,000 annually. By comparison, only 43.1% of Black households and 41.1% of Hispanic households earned at this level.

Generally, the income distributions within the Urban County compared to Will County as a whole are similar. Differences are apparent in Black and Hispanic households making less than \$25,000. These households comprise a larger percentage of Will County residents as a whole. Another difference is that lower-income Asian households are more likely to be located in the Urban County than in entitlement or opt-out communities as evidenced by the higher percentage of less than \$25,000 Asian households in the Urban County.



Blacks and Hispanics experienced poverty at much higher rates than Whites and Asians in Will County in 2010.

The median household income for Blacks and Hispanics was substantially lower than the median income for Whites and Asians. Blacks and Hispanics also had poverty rates exceeding 12%, compared to 4.7% for Whites and 7.0% for Asians.

Figure 2-11

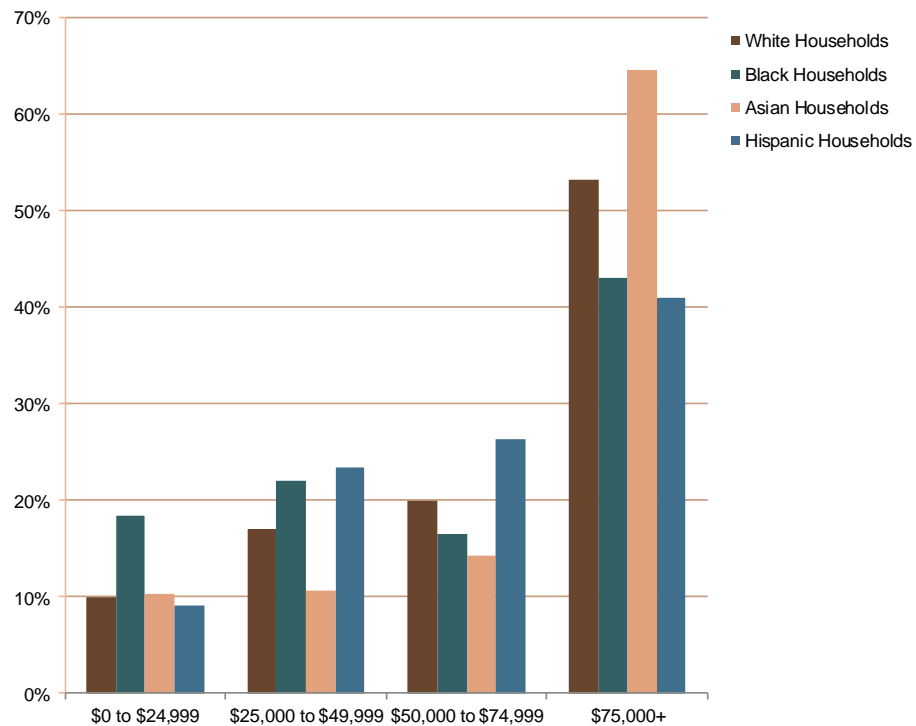
Household Income Distribution by Race and Ethnicity, 2010

| | Total | \$0 to \$24,999 | \$25,000 to \$49,999 | \$50,000 to \$74,999 | \$75,000 and higher |
|----------------------------|---------|--------------------|-------------------------|-------------------------|------------------------|
| All Households | | | | | |
| Will County | 220,135 | 11.9% | 18.2% | 19.2% | 50.7% |
| Urban County* | 152,811 | 10.8% | 17.5% | 19.7% | 52.0% |
| White Households | | | | | |
| Will County | 177,279 | 10.2% | 17.2% | 19.5% | 53.1% |
| Urban County* | 127,917 | 9.9% | 17.0% | 19.9% | 53.1% |
| Black Households | | | | | |
| Will County | 23,412 | 23.9% | 24.8% | 17.3% | 34.1% |
| Urban County* | 13,456 | 18.4% | 22.0% | 16.5% | 43.1% |
| Asian Households | | | | | |
| Will County | 7,838 | 8.0% | 11.7% | 12.2% | 68.2% |
| Urban County* | 4,447 | 10.3% | 10.7% | 14.4% | 64.6% |
| Hispanic Households | | | | | |
| Will County | 23,226 | 12.5% | 25.8% | 24.4% | 37.2% |
| Urban County* | 13,437 | 9.2% | 23.5% | 26.3% | 41.1% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County
Source: U.S. Census Bureau, 2006-10 American Community Survey (B19001, B19001A, B19001B, B19001D, B19001I).

Figure 2-12

Household Income Distribution by Race and Ethnicity, 2010



Source: U.S. Census Bureau, 2006-10 American Community Survey (B19001, B19001A, B19001B, B19001D, B19001I).

Concentrations of Low-to-Moderate Income Persons

The Community Development Block Grant (CDBG) program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, the U.S. Department of Housing and Urban Development (HUD) provides the percentage of LMI persons in each census block group for entitlements such as the Urban County. HUD 2012 LMI estimates reveal that 61 of the 264 census block groups across Will County had at least 51% of residents meeting the definition for LMI status.

Racially/Ethnically Concentrated Areas of Poverty

Of those LMI areas that are wholly or partly in the Urban County, 26 are located in previously identified areas of racial or ethnic concentration. Areas of the Urban County where LMI block groups and minority concentrations coincide are identified for the purposes of this report as Racially/Ethnically Concentrated Areas of Poverty (RCAP/ECAP). It is within the lower-income, higher-minority areas that other demographic, economic and policy characteristics will be analyzed.

The Urban County's RCAPs are identified in Figure 2-13. These areas are largely located around the City of Joliet in Joliet Township and Rockdale Village. Other RCAP areas are Crete Township, Romeoville, Bolingbrook and Lockport Township.

Across Will County, 33 racially and/or ethnically concentrated census tracts are not overlapped by any LMI block groups. Additionally, some tracts are racially/ethnically concentrated, but only partially LMI. These areas are mainly located in the north of the County in the areas in and around Bolingbrook, Aurora, Naperville and in the east around University Park and Sauk Village.

The following maps and figures illustrate the location of LMI block groups and racially/ethnically concentrated areas of poverty.

Figure 2-13
Racially/Ethnically Concentrated Areas of Poverty, 2010

| Jurisdiction* | Tract | Block Group | % LMI | Concentration |
|-------------------|---------|-------------|-------|--------------------------------|
| Bolingbrook City | 8801.17 | 1 | 57.2% | 28.4% Black and 27.3% Hispanic |
| Bolingbrook City | 8801.17 | 2 | 57.2% | 28.4% Black and 27.3% Hispanic |
| Bolingbrook City | 8801.17 | 3 | 57.2% | 28.4% Black and 27.3% Hispanic |
| Romeoville City | 8802.03 | 2 | 53.5% | 30.5% Hispanic |
| Lockport Township | 8807.02 | 1 | 69.0% | 43.9% Black |
| Lockport Township | 8807.02 | 3 | 51.3% | 43.9% Black |
| Joliet Township | 8812 | 1 | 73.8% | 59.3% Black and 26.1% Hispanic |
| Joliet Township | 8812 | 2 | 69.3% | 59.3% Black and 26.1% Hispanic |
| Joliet Township | 8812 | 3 | 51.5% | 59.3% Black and 26.1% Hispanic |
| Joliet Township | 8813.02 | 2 | 77.7% | 87.0% Hispanic |
| Joliet Township | 8814.01 | 1 | 54.7% | 42.3% Hispanic |
| Joliet Township | 8822 | 1 | 71.5% | 59.7% Hispanic |
| Joliet Township | 8822 | 2 | 66.0% | 59.7% Hispanic |
| Joliet Township | 8822 | 3 | 65.2% | 59.7% Hispanic |
| Joliet Township | 8822 | 4 | 65.0% | 59.7% Hispanic |
| Joliet Township | 8823 | 2 | 58.8% | 34.8% Hispanic |
| Joliet Township | 8824 | 3 | 58.3% | 43.5% Black and 49.5% Hispanic |
| Rockdale Village | 8829 | 1 | 51.6% | 33.5% Hispanic |
| Rockdale Village | 8829 | 2 | 57.4% | 33.5% Hispanic |
| Joliet Township | 8830 | 1 | 53.6% | 37.3% Black |
| Joliet Township | 8830 | 2 | 52.1% | 37.3% Black |
| Joliet Township | 8830 | 3 | 62.1% | 37.3% Black |
| Joliet Township | 8831 | 1 | 55.4% | 53.9% Black |
| Joliet Township | 8831 | 2 | 55.4% | 53.9% Black |
| Joliet Township | 8831 | 3 | 62.9% | 53.9% Black |
| Crete Township | 8838.03 | 2 | 51.2% | 76.3% Black |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, Census 2010 Redistricting Data; 2012 HUD LMI Estimates

Twenty-six areas of the Urban County include concentrations of both LMI persons and minorities.

These racially/ethnically concentrated areas of poverty are located in Bolingbrook, Romeoville and Rockdale as well as the townships of Lockport, Joliet and Crete. Of the 26 areas, nine are areas of Black concentration, ten are areas of Hispanic concentration, and the remaining seven have both Black and Hispanic concentrations.

6. Disability and Income

Defining Disability

As defined by the Census Bureau, a disability is a long-lasting physical, mental or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).

Disability in Will County

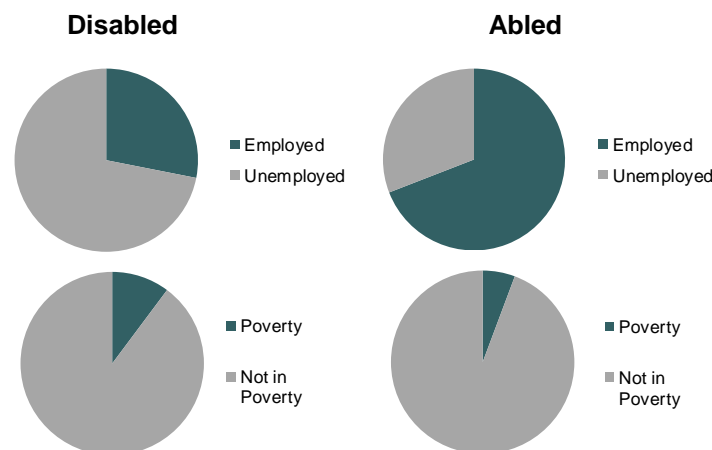
Within the Urban County, 12.2% of the population age five years and older reported at least one type of a disability.

In Will County as a whole, 12.8% of the population reported at least one type of disability in 2000. By 2010, the total number of people reporting a disability in Will County had fallen by 7,590 to a total population reporting a disability of 50,041. The percentage of people age five and up reporting a disability in Will County in 2010 had similarly fallen from 12.8% of the total population to an estimated 8.1%.⁴ The map on the following page shows the percent of the total population with a disability by jurisdiction.

Median Income and Poverty

Those reporting a disability were significantly less likely to be employed. Only 28.1% of persons with a disability were employed in Will County in 2010 compared to 69.1% of people without a disability. In Will County, persons with disabilities were almost twice as likely as persons without disabilities to live in poverty. In 2010, 10.2% of persons with disabilities lived in poverty, compared to 5.7% of persons without disabilities who were living in poverty. Those persons with disabilities living in poverty were concentrated in the entitlement and opt-out communities in 2000. In those communities, 13.7% of persons with disabilities lived in poverty compared to only 6.3% of persons with disabilities in the Urban County.

Figure 2-14
Disability, Employment and Poverty, 2010



Source: U.S. Census Bureau, 2006-10 American Community Survey (S1810, S1811)

⁴ These decreases may be due to a change in the way the disability questions were phrased in 2010 compared to 2000. After conducting content testing in 2003, the Census Bureau found that respondents misunderstood some of the disability questions, meaning that the reported disability rate in 2000 is likely higher than the actual disability rate. Source: <https://www.census.gov/people/disability/methodology/acs.html>



Persons with disabilities were almost twice as likely to live in poverty as persons without disabilities.

Among all Will County residents with a disability in 2010, 10.2% lived in poverty, compared to 5.7% of persons without disabilities. Persons with disabilities are concentrated in larger, entitlement and opt-out communities, likely because rental housing, assisted living facilities, and public and human services are most often located in these areas.

7. Familial Status and Income

Defining Family

The Census bureau divides households into family and non-family households. Family households are married-couple families with or without children, single-parent families and other families comprised of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Families in Will County

In the Urban County, female-headed households grew from 10.3% of all households to 13.0% in 2010, and female-headed households with children increased from 4.6% to 5.5%. Similarly, the proportion of male-headed households with children increased from 1.9% in 2000 to 2.0% in 2010. By comparison, married-couple family households with children declined from 35.9% to 31.3% during the same period. Single-person and non-family households comprise a growing share of the population, expanding from 19.7% in 2000 to 22.0% in 2010. These trends reflect national trends on the changing demographics of households.

Figure 2-15
Households Type and Presence of Children, 2000-2010

| | | Family Households | | | | | | | | | Non-family Households | |
|---------------|---------------|-------------------|------------|-------------------------|------------|--------------------------|------------------|------------|------------------------|------------------|-----------------------|-------|
| | | Total Households | % of Total | Married-couple families | | Female-headed Households | | | Male-headed Households | | | |
| % of Total | With Children | | | Without Children | % of Total | With Children | Without Children | % of Total | With Children | Without Children | | |
| 2000 | | | | | | | | | | | | |
| Will County | 167,602 | 78.6% | 65.9% | 36.3% | 29.5% | 8.9% | 5.0% | 3.9% | 3.8% | 2.0% | 1.8% | 21.4% |
| Urban County* | 115,439 | 80.3% | 68.4% | 35.9% | 32.5% | 8.3% | 4.6% | 3.7% | 3.7% | 1.9% | 1.8% | 19.7% |
| 2010 | | | | | | | | | | | | |
| Will County | 225,256 | 77.3% | 61.9% | 32.4% | 29.5% | 10.9% | 6.1% | 4.7% | 4.5% | 2.1% | 2.3% | 22.7% |
| Urban County* | 156,128 | 78.0% | 63.4% | 31.3% | 32.2% | 10.2% | 5.5% | 4.6% | 4.4% | 2.0% | 2.3% | 22.0% |

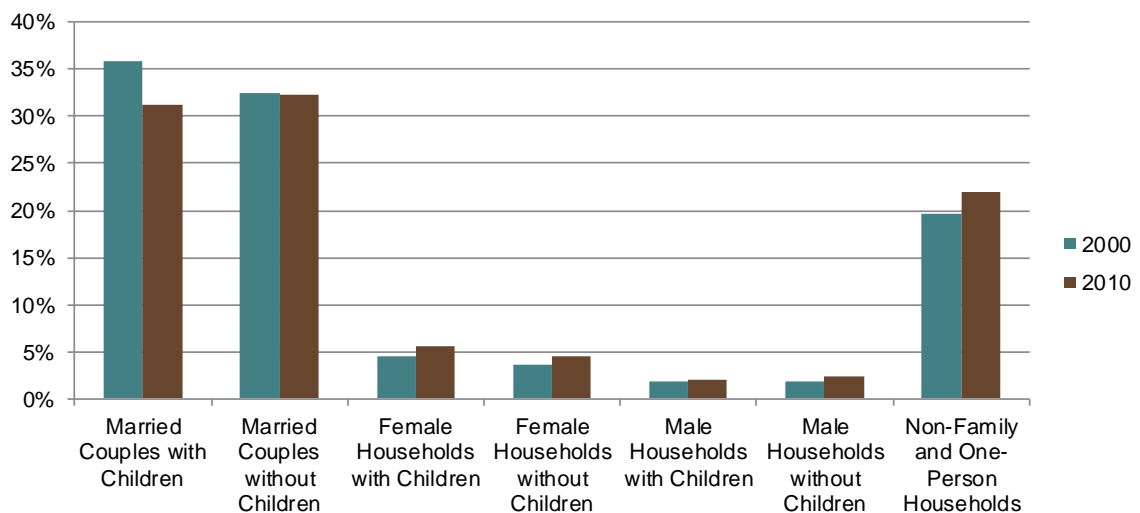
* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County
Source: U.S. Census Bureau, Census 2000 (SF3, P10), 2006-10 American Community Survey (B11001, B11003)



Families in Poverty

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the potential unwillingness of some landlords to rent their units to families with children. Although they comprised 5.5% of families in the Urban County in 2010, female-headed households with children accounted for 44.6% of all families living in poverty. Among female-headed households with children, 21.5% were living in poverty, compared to just 2.5% of married-couple families with children.

Figure 2-16
Trends in Household Type, 2000-2010



Source: U.S. Census Bureau, Census 2000 (SF3, P10), 2006-10 American Community Survey (B11001, B11003)

Female-headed households with children accounted for more than 40% of all families living below the level of poverty in the Urban County.

Female-headed households with children comprised 44.6% of all families living in poverty and were 17 times as likely to live in poverty as married-couple families with children.

8. Ancestry and Income

Foreign-Born Residents of Will County

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations reported that in 2010, 11.5% of all Will County residents were foreign-born. Similarly, 10.1% of all people across the Urban County, 45,875, were foreign-born.

By way of origin, almost half of the Urban County's foreign-born population (42.8%) came from Latin American nations, while 28.6% came from Asian

countries and 22.7% came from Europe. These shares are similar to the state of Illinois and Will County as a whole, with slightly more European and slightly fewer Latin American immigrants in the Urban County than the County as a whole.

Foreign-Born Families in Poverty

Will County's foreign-born population is statistically more likely to experience poverty. According to 2006-10 American Community Survey estimates, 7.1% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to 5.3% of all persons in the Urban County for whom poverty status is determined.

Language Groups in Will County

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In 2010, the Census Bureau reported that 43,684 persons in Will County spoke English less than "very well." This limited English proficiency subpopulation constituted 6.4% of the County's total population.

The four language groups with more than 1,000 persons with LEP included Spanish, Polish, Chinese and Tagalog, which is spoken by some persons native to the Philippines. To determine whether translation of vital documents would be required, a HUD entitlement community must first identify the number of persons with LEP in a single language group who are likely to qualify for and be served by the Urban County's programs.

Figure 2-17

Limited English Proficiency Language Groups, 2010

| Language Group | Number of LEP Speakers | Percentage of Total Population |
|----------------|------------------------|--------------------------------|
| Spanish | 30,031 | 4.4% |
| Polish | 3,352 | 0.5% |
| Chinese | 1,453 | 0.2% |
| Tagalog | 1,251 | 0.2% |

Source: U.S. Census Bureau, 2006-10 American Community Survey (B16001)

Four language groups in Will County have sufficiently large numbers of limited-English speakers to warrant further analysis of their access to Urban County programs and services.

In Will County, there are more than 1,000 speakers of Spanish, Polish, Chinese and Tagalog that have limited proficiency in English.

9. Protected Class Status and Unemployment

Unemployment in Will County

As of August 2012, the latest month for which data is available, Will County's unemployment rate was 8.5%, lower than the statewide rate of 8.9%.

American Community Survey estimates spanning recent years provide detailed data by gender and race, indicating some differences in employment rates among groups. Women experienced unemployment at lower rates than men, with 7.2% of women unemployed compared to 8.1% of men. In the Urban County, Black residents were substantially more likely to be unemployed than White residents, with unemployment rates of 13.2% and 7.0%, respectively.

Figure 2-18
Civilian Labor Force, 2010

| Civilian Labor Force | Illinois | | Will County | | Urban County* | |
|----------------------|------------------|---------------|----------------|---------------|----------------|---------------|
| | Total | % | Total | % | Total | % |
| Total CLF | 6,632,592 | 100.0% | 349,527 | 100.0% | 243,349 | 100.0% |
| Employed | 6,062,848 | 91.4% | 322,166 | 92.2% | 224,730 | 92.3% |
| Unemployed | 569,744 | 8.6% | 27,361 | 7.8% | 18,619 | 7.7% |
| Male CLF | 3,498,987 | 52.8% | 190,110 | 54.4% | 132,183 | 54.3% |
| Employed | 3,182,460 | 91.0% | 174,519 | 91.8% | 121,533 | 91.9% |
| Unemployed | 316,527 | 9.0% | 15,591 | 8.2% | 10,650 | 8.1% |
| Female CLF | 3,133,605 | 47.2% | 159,417 | 45.6% | 111,166 | 45.7% |
| Employed | 2,880,388 | 91.9% | 147,647 | 92.6% | 103,197 | 92.8% |
| Unemployed | 253,217 | 8.1% | 11,770 | 7.4% | 7,969 | 7.2% |
| White CLF | 4,929,588 | 74.3% | 275,771 | 78.9% | 199,111 | 81.8% |
| Employed | 4,583,332 | 93.0% | 256,675 | 93.1% | 185,183 | 93.0% |
| Unemployed | 346,256 | 7.0% | 19,096 | 6.9% | 13,928 | 7.0% |
| Black CLF | 836,976 | 12.6% | 35,641 | 10.2% | 21,306 | 8.8% |
| Employed | 689,591 | 82.4% | 30,499 | 85.6% | 18,483 | 86.8% |
| Unemployed | 147,385 | 17.6% | 5,142 | 14.4% | 2,823 | 13.2% |
| Asian CLF | 312,845 | 4.7% | 14,178 | 4.1% | 8,158 | 3.4% |
| Employed | 292,910 | 93.6% | 13,403 | 94.5% | 7,643 | 93.7% |
| Unemployed | 19,935 | 6.4% | 775 | 5.5% | 515 | 6.3% |
| Hispanic CLF | 940,532 | 14.2% | 47,741 | 13.7% | 27,754 | 11.4% |
| Employed | 846,791 | 90.0% | 43,452 | 91.0% | 25,312 | 91.2% |
| Unemployed | 93,741 | 10.0% | 4,289 | 9.0% | 2,442 | 8.8% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau: 2006-10 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I).



Blacks were substantially more likely than Whites to be unemployed in the Urban County in 2010.

More than 13% of Blacks were unemployed in 2010, compared to 7% of Whites.

B. Housing Market

1. Housing Inventory

Housing in Will County

The housing stock in the Urban County increased by 43,813 units, or 36.3%, between 2000 and 2010.

Housing stock decreased in eight areas in the County between 2000 and 2010: Troy Township, Steger Village, Joliet Township, Jackson Township, Wilmington Township, Reed Township, Channahon Township, and Homer Township. Much of this decrease is actually a shift in the housing stock due to annexation. The shift in Homer Township, for example, which experienced the largest decrease, is likely due to the incorporation of the Village of Homer Glen.

The number of homes in some areas increased rapidly due to a small number of initial homes in the County. Orland Park, for instance, increased 8700%, but only added 174 new units. Other areas expanded into Will County for the first time, such as Braceville which annexed a small parcel and its first home in Will County. The greatest numerical gains came from Joliet, Plainfield, Bolingbrook and Romeoville, which all increased by more than 5,000 new housing units and 27.3%, 158.7%, 30.2% and 71.1%, respectively. The greatest growth in number of homes happened in the northern half of the County and mostly within municipalities. A net loss of homes (i.e. demolition vs. a shift due to annexation) primarily occurred in the western townships on the border of the County.

Figure 2-19 and the following map show the change in housing inventory since 2000.

Figure 2-19

Trends in Total Housing Units by Jurisdiction, 2000-2010

| Jurisdiction | 2000 | 2010 | Change | Jurisdiction | 2000 | 2010 | Change |
|-------------------------|----------------|----------------|--------------|-------------------------|----------------|----------------|--------------|
| Will County | 175,524 | 237,501 | 35.3% | Urban County*** | 120,557 | 164,370 | 36.3% |
| Orland Park Village** | 2 | 176 | 8700.0% | Custer Township | 517 | 593 | 14.7% |
| Aurora City* | 1,266 | 3,654 | 188.6% | Frankfort Township | 4,403 | 5,048 | 14.6% |
| Tinley Park Village** | 816 | 2,311 | 183.2% | Florence Township | 166 | 190 | 14.5% |
| Plainfield Village | 4,609 | 11,923 | 158.7% | Monee Township | 619 | 701 | 13.2% |
| Diamond Village** | 4 | 9 | 125.0% | Washington Township | 629 | 697 | 10.8% |
| Shorewood Village | 2,647 | 5,716 | 115.9% | University Park Village | 2,379 | 2,610 | 9.7% |
| Manhattan Village | 1,163 | 2,462 | 111.7% | Will Township | 446 | 488 | 9.4% |
| Beecher Village | 876 | 1,707 | 94.9% | New Lenox Township | 3,566 | 3,842 | 7.7% |
| Romeoville Village | 7,379 | 12,623 | 71.1% | Park Forest Village** | 1,301 | 1,401 | 7.7% |
| Frankfort Village | 3,580 | 6,070 | 69.6% | Lockport Township | 4,384 | 4,687 | 6.9% |
| Monee Village | 1,271 | 2,100 | 65.2% | Manhattan Township | 690 | 734 | 6.4% |
| Homer Glen Village **** | 5,183 | 8,389 | 61.9% | Symerton Village | 36 | 38 | 5.6% |
| Crest Hill City | 4,808 | 7,704 | 60.2% | Wheatland Township | 1,841 | 1,943 | 5.5% |
| Green Garden Township | 838 | 1,341 | 60.0% | Crete Township | 3,579 | 3,769 | 5.3% |
| Lockport City | 5,835 | 9,252 | 58.6% | Rockdale Village | 826 | 854 | 3.4% |
| Minooka Village | 452 | 621 | 37.4% | Plainfield Township | 4,588 | 4,723 | 2.9% |
| Channahon Village | 2,316 | 3,173 | 37.0% | Wesley Township | 870 | 879 | 1.0% |
| Elwood Village | 675 | 924 | 36.9% | Lemont Village** | 1 | 1 | 0.0% |
| New Lenox Village | 6,064 | 8,244 | 35.9% | Troy Township | 1,370 | 1,368 | -0.1% |
| Mokena Village | 4,848 | 6,585 | 35.8% | Steger Village** | 2,520 | 2,496 | -1.0% |
| Naperville City* | 11,103 | 14,758 | 32.9% | Joliet Township | 4,904 | 4,745 | -3.2% |
| Bolingbrook Village | 17,381 | 22,636 | 30.2% | Jackson Township | 660 | 617 | -6.5% |
| Braidwood City | 2,305 | 2,943 | 27.7% | Wilmington Township | 599 | 553 | -7.7% |
| Joliet City* | 37,954 | 48,315 | 27.3% | Reed Township | 118 | 90 | -23.7% |
| Peotone Village | 1,299 | 1,582 | 21.8% | Channahon Township | 437 | 329 | -24.7% |
| Crete Village | 2,807 | 3,387 | 20.7% | Homer Township | 2,932 | 1,211 | -58.7% |
| Du Page Township | 794 | 955 | 20.3% | Woodridge Village* | 0 | 10 | - |
| Peotone Township | 305 | 358 | 17.4% | Braceville Village | 0 | 1 | - |
| Wilmington City | 2,097 | 2,426 | 15.7% | Coal City Village | 0 | 1 | - |
| Wilton Township | 275 | 318 | 15.6% | Matteson Village | 0 | 0 | - |
| Godley Village | 191 | 220 | 15.2% | Sauk Village Village | 0 | 0 | - |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

**** Homer Glen incorporated in 2001. Its change in units is compared to Goodings Grove, a similar Census Designated Place

Source: U.S. Census Bureau, Census 2000 (SF1, H1), Census 2010 (SF1, H1)

The greatest growth in housing inventories occurred in the County's northern half, and mostly within municipalities.

2. Types of Housing Units

Housing Types in Will County

In 2010, single-family units comprised 88.3% of the housing stock in the Urban County, and multi-family units comprised 9.4%. Mobile homes accounted for most of the remaining 2.3%. In six municipalities, multi-family units comprised more than one-fourth of the housing stock. Joliet alone accounts for 37.6% of all multi-family rental units in the County. Within the Urban County, eight municipalities combined comprise more than 70% of all multi-family rental units in the County.

These numbers are shown in Figure 2-20. As the table is based on five-year ACS estimates, in order to obtain details at the local level, the countywide total differs from the total number of units counted in the 2010 Census data (100% count).

Figure 2-20
Number of Housing Units in Structure by Jurisdiction, 2010

| Jurisdiction | Total Units | Single-family units | Multi-family units | | | | | Mobile home | Boat, RV, van, etc. |
|-------------------------|----------------|---------------------|--------------------|--------------|--------------|--------------|---------------|--------------|---------------------|
| | | | 2 to 4 | 5 to 9 | 10 to 19 | 20 or more | Total | | |
| Will County | 233,921 | 201,265 | 10,172 | 5,093 | 6,588 | 6,851 | 28,704 | 3,897 | 55 |
| Urban County *** | 162,096 | 143,176 | 4,910 | 3,087 | 3,718 | 3,447 | 15,162 | 3,731 | 27 |
| Aurora City* | 3,426 | 3,318 | 12 | 67 | 0 | 29 | 108 | 0 | 0 |
| Beecher Village | 1,717 | 1,439 | 207 | 15 | 42 | 14 | 278 | 0 | 0 |
| Bolingbrook Village | 22,895 | 20,399 | 336 | 404 | 530 | 1,202 | 2,472 | 24 | 0 |
| Braceville Village | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Braidwood City | 2,859 | 2,065 | 74 | 48 | 0 | 60 | 182 | 599 | 13 |
| Channahon Township | 319 | 319 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Channahon Village | 2,993 | 2,805 | 87 | 0 | 0 | 15 | 102 | 86 | 0 |
| Coal City Village | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Crest Hill City | 8,182 | 5,790 | 220 | 456 | 942 | 726 | 2,344 | 48 | 0 |
| Crete Township | 3,788 | 3,096 | 11 | 0 | 20 | 22 | 53 | 639 | 0 |
| Crete Village | 3,748 | 3,010 | 337 | 200 | 33 | 16 | 586 | 152 | 0 |
| Custer Township | 585 | 539 | 0 | 0 | 0 | 0 | 0 | 46 | 0 |
| Diamond Village** | 21 | 19 | 0 | 0 | 0 | 0 | 0 | 2 | 0 |
| Du Page Township | 1,089 | 1,074 | 0 | 15 | 0 | 0 | 15 | 0 | 0 |
| Elwood Village | 909 | 858 | 35 | 3 | 0 | 0 | 38 | 13 | 0 |
| Florence Township | 210 | 210 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Frankfort Township | 5,374 | 4,912 | 18 | 14 | 30 | 0 | 62 | 400 | 0 |
| Frankfort Village | 5,693 | 5,366 | 96 | 92 | 129 | 10 | 327 | 0 | 0 |
| Godley Village | 253 | 102 | 22 | 0 | 0 | 0 | 22 | 129 | 0 |
| Green Garden Township | 1,262 | 1,215 | 15 | 0 | 0 | 0 | 15 | 32 | 0 |
| Homer Glen Village | 8,038 | 7,705 | 24 | 21 | 93 | 184 | 322 | 11 | 0 |
| Homer Township | 1,382 | 1,347 | 0 | 0 | 0 | 0 | 0 | 35 | 0 |
| Jackson Township | 604 | 571 | 0 | 33 | 0 | 0 | 33 | 0 | 0 |
| Joliet City* | 47,653 | 36,948 | 4,718 | 1,511 | 1,654 | 2,678 | 10,561 | 116 | 28 |
| Joliet Township | 5,043 | 4,396 | 317 | 108 | 178 | 18 | 621 | 26 | 0 |
| Lemont Village** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Lockport City | 8,839 | 7,794 | 587 | 202 | 233 | 13 | 1,035 | 10 | 0 |
| Lockport Township | 4,286 | 3,819 | 224 | 124 | 11 | 47 | 406 | 61 | 0 |
| Manhattan Township | 833 | 833 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Manhattan Village | 2,422 | 2,195 | 79 | 138 | 10 | 0 | 227 | 0 | 0 |
| Matteson Village | 23 | 0 | 23 | 0 | 0 | 0 | 23 | 0 | 0 |
| Minooka Village | 561 | 561 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Mokena Village | 6,227 | 5,397 | 326 | 255 | 151 | 98 | 830 | 0 | 0 |
| Monee Township | 640 | 624 | 0 | 0 | 0 | 0 | 0 | 16 | 0 |
| Monee Village | 1,994 | 1,441 | 94 | 0 | 28 | 0 | 122 | 431 | 0 |
| Naperville City* | 13,992 | 13,285 | 285 | 235 | 64 | 108 | 692 | 15 | 0 |
| New Lenox Township | 3,801 | 3,688 | 76 | 0 | 10 | 0 | 86 | 27 | 0 |
| New Lenox Village | 7,964 | 7,057 | 270 | 316 | 259 | 47 | 892 | 15 | 0 |
| Orland Park Village** | 139 | 0 | 0 | 27 | 36 | 76 | 139 | 0 | 0 |

continued ...

| Jurisdiction | Total Units | Single-family units | Multi-family units | | | | | Mobile home | Boat, RV, van, etc. |
|-------------------------|----------------|---------------------|--------------------|--------------|--------------|--------------|---------------|--------------|---------------------|
| | | | 2 to 4 | 5 to 9 | 10 to 19 | 20 or more | Total | | |
| Will County | 233,921 | 201,265 | 10,172 | 5,093 | 6,588 | 6,851 | 28,704 | 3,897 | 55 |
| Urban County *** | 162,096 | 143,176 | 4,910 | 3,087 | 3,718 | 3,447 | 15,162 | 3,731 | 27 |
| Park Forest Village** | 1,448 | 965 | 19 | 35 | 147 | 282 | 483 | 0 | 0 |
| Peotone Township | 326 | 270 | 0 | 0 | 0 | 0 | 0 | 56 | 0 |
| Peotone Village | 1,770 | 1,542 | 199 | 13 | 16 | 0 | 228 | 0 | 0 |
| Plainfield Township | 4,848 | 4,786 | 51 | 0 | 0 | 0 | 51 | 11 | 0 |
| Plainfield Village | 10,998 | 10,349 | 282 | 81 | 125 | 161 | 649 | 0 | 0 |
| Reed Township | 91 | 52 | 0 | 0 | 0 | 0 | 0 | 39 | 0 |
| Rockdale Village | 882 | 705 | 137 | 34 | 0 | 0 | 171 | 6 | 0 |
| Romeoville Village | 11,844 | 10,759 | 116 | 98 | 678 | 112 | 1,004 | 67 | 14 |
| Sauk Village Village | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Shorewood Village | 5,251 | 4,480 | 43 | 72 | 56 | 188 | 359 | 412 | 0 |
| Steger Village** | 2,860 | 1,555 | 228 | 131 | 682 | 231 | 1,272 | 33 | 0 |
| Symerton Village | 31 | 28 | 3 | 0 | 0 | 0 | 3 | 0 | 0 |
| Tinley Park Village** | 2,269 | 1,982 | 0 | 0 | 287 | 0 | 287 | 0 | 0 |
| Troy Township | 1,329 | 1,322 | 0 | 0 | 0 | 0 | 0 | 7 | 0 |
| University Park Village | 2,997 | 1,921 | 354 | 168 | 129 | 425 | 1,076 | 0 | 0 |
| Washington Township | 544 | 530 | 6 | 0 | 0 | 0 | 6 | 8 | 0 |
| Wesley Township | 935 | 919 | 0 | 0 | 0 | 0 | 0 | 16 | 0 |
| Wheatland Township | 1,939 | 1,924 | 0 | 0 | 0 | 0 | 0 | 15 | 0 |
| Will Township | 503 | 406 | 0 | 0 | 0 | 16 | 16 | 81 | 0 |
| Wilmington City | 2,389 | 1,806 | 225 | 177 | 15 | 73 | 490 | 93 | 0 |
| Wilmington Township | 507 | 379 | 16 | 0 | 0 | 0 | 16 | 112 | 0 |
| Wilton Township | 379 | 371 | 0 | 0 | 0 | 0 | 0 | 8 | 0 |
| Woodridge Village** | 17 | 17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, 2006-10 American Community Survey (B25024)

Owner- vs. Renter-Occupied Housing

In 2010, the ACS estimated that the Urban County's occupied housing inventory of 152,811 was 88.3% owner-occupied and 11.7% renter-occupied. This is a higher homeownership rate than in 2000, where 84.0% of occupied housing units were owner-occupied and 16.0% were renter-occupied. While 2.2% of owner-occupied housing units are located in multi-family structures, such as condominium buildings, 55.8% of renter-occupied units are located in multi-family structures. This equates to 9,999 renter-occupied multi-family units in the Urban County out of a total 17,904 renter-occupied units. Multi-family rental units are concentrated in particular areas of Will County, with the largest percentage of 37.6% focused in Joliet.

With the exception of Joliet, renter-occupied, multi-family units represent less than 10% of the total occupied housing inventory in each jurisdiction. Of all jurisdictions, almost a third had less than one percent of their housing stock as renter-occupied multi-family. Even in comparably large communities such as Homer Glen, for example, of the 7,396 total occupied units, only 162 were renter-occupied multi-family units, equivalent to just 2.1% of the Village's occupied housing stock.

Figure 2-21
Housing Units by Tenure and Structure Type, 2010

| Jurisdiction | Owner-Occupied | | | | Renter-Occupied | | | | % Renter-Occupied Multi-Family |
|-------------------------|----------------|---------------|--------------|----------------|-----------------|---------------|---------------|----------------|--------------------------------|
| | Total | Single-Family | Multi-Family | % Multi-Family | Total | Single-Family | Multi-Family | % Multi-Family | |
| Will County | 187,125 | 22,287 | 5,310 | 2.8% | 33,010 | 13,286 | 19,319 | 58.5% | 8.8% |
| Urban County *** | 134,907 | 16,407 | 3,001 | 2.2% | 17,904 | 7,559 | 9,999 | 55.8% | 6.5% |
| Aurora City* | 3,085 | 3,018 | 67 | 2.2% | 226 | 185 | 41 | 18.1% | 1.2% |
| Beecher Village | 1,399 | 1,340 | 59 | 4.2% | 219 | 26 | 193 | 88.1% | 11.9% |
| Bolingbrook Village | 18,706 | 18,387 | 295 | 1.6% | 2,978 | 1,157 | 1,821 | 61.1% | 8.4% |
| Braceville Village | 0 | 0 | 0 | - | 0 | 0 | 0 | - | - |
| Braidwood City | 1,993 | 1,798 | 0 | 0.0% | 311 | 150 | 109 | 35.0% | 4.7% |
| Channahon Township | 319 | 319 | 0 | 0.0% | 0 | 0 | 0 | - | 0.0% |
| Channahon Village | 2,785 | 2,671 | 28 | 1.0% | 153 | 94 | 59 | 38.6% | 2.0% |
| Coal City Village | 0 | 0 | 0 | - | 0 | 0 | 0 | - | - |
| Crest Hill City | 5,681 | 5,232 | 417 | 7.3% | 1,973 | 280 | 1,677 | 85.0% | 21.9% |
| Crete Township | 3,357 | 2,781 | 11 | 0.3% | 177 | 105 | 42 | 23.7% | 1.2% |
| Crete Village | 3,149 | 2,743 | 314 | 10.0% | 358 | 152 | 206 | 57.5% | 5.9% |
| Custer Township | 481 | 440 | 0 | 0.0% | 70 | 65 | 0 | 0.0% | 0.0% |
| Diamond Village** | 2 | 0 | 0 | 0.0% | 0 | 0 | 0 | - | 0.0% |
| Du Page Township | 944 | 929 | 15 | 1.6% | 46 | 46 | 0 | 0.0% | 0.0% |
| Elwood Village | 773 | 741 | 19 | 2.5% | 103 | 84 | 19 | 18.4% | 2.2% |
| Florence Township | 210 | 210 | 0 | 0.0% | 0 | 0 | 0 | - | 0.0% |
| Frankfort Township | 4,896 | 4,487 | 44 | 0.9% | 121 | 103 | 18 | 14.9% | 0.4% |
| Frankfort Village | 5,197 | 5,034 | 163 | 3.1% | 164 | 26 | 138 | 84.1% | 2.6% |
| Godley Village | 147 | 84 | 3 | 2.0% | 98 | 18 | 19 | 19.4% | 7.8% |
| Green Garden Township | 1,137 | 1,137 | 0 | 0.0% | 76 | 29 | 15 | 19.7% | 1.2% |
| Homer Glen Village | 7,396 | 7,278 | 107 | 1.4% | 402 | 240 | 162 | 40.3% | 2.1% |
| Homer Township | 1,231 | 1,205 | 0 | 0.0% | 52 | 43 | 0 | 0.0% | 0.0% |
| Jackson Township | 535 | 502 | 33 | 6.2% | 69 | 69 | 0 | 0.0% | 0.0% |
| Joliet City* | 32,228 | 30,537 | 1,617 | 5.0% | 11,902 | 4,621 | 7,255 | 61.0% | 16.4% |
| Joliet Township | 3,261 | 3,183 | 52 | 1.6% | 1,306 | 829 | 477 | 36.5% | 10.4% |
| Lemont Village** | 0 | 0 | 0 | - | 0 | 0 | 0 | - | - |
| Lockport City | 7,471 | 7,164 | 297 | 4.0% | 960 | 306 | 654 | 68.1% | 7.8% |
| Lockport Township | 3,534 | 3,294 | 191 | 5.4% | 525 | 349 | 164 | 31.2% | 4.0% |
| Manhattan Township | 713 | 713 | 0 | 0.0% | 71 | 71 | 0 | 0.0% | 0.0% |
| Manhattan Village | 2,047 | 2,047 | 0 | 0.0% | 218 | 53 | 165 | 75.7% | 7.3% |
| Matteson Village | 23 | 0 | 23 | 100.0% | 0 | 0 | 0 | - | 0.0% |
| Minooka Village | 547 | 547 | 0 | 0.0% | 14 | 14 | 0 | 0.0% | 0.0% |
| Mokena Village | 5,306 | 5,034 | 272 | 5.1% | 745 | 244 | 501 | 67.2% | 8.3% |
| Monee Township | 477 | 461 | 0 | 0.0% | 39 | 39 | 0 | 0.0% | 0.0% |
| Monee Village | 1,727 | 1,345 | 12 | 0.7% | 162 | 65 | 97 | 59.9% | 5.1% |
| Naperville City* | 12,822 | 12,489 | 318 | 2.5% | 766 | 488 | 278 | 36.3% | 2.0% |
| New Lenox Township | 3,559 | 3,548 | 0 | 0.0% | 159 | 73 | 86 | 54.1% | 2.3% |
| New Lenox Village | 7,018 | 6,750 | 253 | 3.6% | 728 | 226 | 502 | 69.0% | 6.5% |
| Orland Park Village** | 29 | 0 | 29 | 100.0% | 110 | 0 | 110 | 100.0% | 79.1% |
| Park Forest Village** | 662 | 620 | 42 | 6.3% | 618 | 177 | 441 | 71.4% | 34.5% |
| Peotone Township | 207 | 177 | 0 | 0.0% | 78 | 52 | 0 | 0.0% | 0.0% |
| Peotone Village | 1,456 | 1,456 | 0 | 0.0% | 238 | 86 | 152 | 63.9% | 9.0% |
| Plainfield Township | 4,405 | 4,367 | 38 | 0.9% | 218 | 194 | 13 | 6.0% | 0.3% |
| Plainfield Village | 8,965 | 8,866 | 99 | 1.1% | 1,062 | 701 | 361 | 34.0% | 3.6% |
| Reed Township | 91 | 52 | 0 | 0.0% | 0 | 0 | 0 | - | 0.0% |
| Rockdale Village | 481 | 457 | 18 | 3.7% | 339 | 186 | 153 | 45.1% | 18.7% |

continued ...

| Jurisdiction | Owner-Occupied | | | | Renter-Occupied | | | | % Renter-Occupied Multi-Family |
|-------------------------|----------------|---------------|--------------|----------------|-----------------|---------------|--------------|----------------|--------------------------------|
| | Total | Single-Family | Multi-Family | % Multi-Family | Total | Single-Family | Multi-Family | % Multi-Family | |
| Romeoville Village | 10,292 | 10,176 | 35 | 0.3% | 1,134 | 367 | 767 | 67.6% | 6.7% |
| Sauk Village | 0 | 0 | 0 | - | 0 | 0 | 0 | - | - |
| Shorewood Village | 4,645 | 4,175 | 95 | 2.0% | 422 | 168 | 217 | 51.4% | 4.3% |
| Steger Village** | 1,220 | 1,211 | 9 | 0.7% | 1,448 | 245 | 1,170 | 80.8% | 43.9% |
| Symerton Village | 28 | 28 | 0 | 0.0% | 3 | 0 | 3 | 100.0% | 9.7% |
| Tinley Park Village** | 2,153 | 1,926 | 227 | 10.5% | 36 | 11 | 25 | 69.4% | 1.1% |
| Troy Township | 1,185 | 1,178 | 0 | 0.0% | 21 | 21 | 0 | 0.0% | 0.0% |
| University Park Village | 1,532 | 1,458 | 74 | 4.8% | 1,121 | 288 | 833 | 74.3% | 31.4% |
| Washington Township | 437 | 437 | 0 | 0.0% | 70 | 56 | 6 | 8.6% | 1.2% |
| Wesley Township | 749 | 733 | 0 | 0.0% | 101 | 101 | 0 | 0.0% | 0.0% |
| Wheatland Township | 1,786 | 1,771 | 0 | 0.0% | 69 | 69 | 0 | 0.0% | 0.0% |
| Will Township | 384 | 348 | 0 | 0.0% | 25 | 9 | 16 | 64.0% | 3.9% |
| Wilmington City | 1,647 | 1,550 | 34 | 2.1% | 572 | 204 | 338 | 59.1% | 15.2% |
| Wilmington Township | 327 | 290 | 0 | 0.0% | 78 | 45 | 16 | 20.5% | 4.0% |
| Wilton Township | 271 | 263 | 0 | 0.0% | 56 | 56 | 0 | 0.0% | 0.0% |
| Woodridge Village** | 17 | 17 | 0 | 0.0% | 0 | 0 | 0 | - | 0.0% |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, 2006-10 American Community Survey (B25032)

The following maps illustrate the distribution of multi-family units across Will County, indicating the extent to which they are located with much greater density in the City of Joliet and a few additional municipalities in general.



In all jurisdictions in Will County except Joliet, renter-occupied, multi-family units represented less than 10% of the total occupied housing inventory. Almost a third of all communities' housing stocks had less than 1% as renter-occupied multi-family units.

3. Protected Class Status and Home Ownership

The Benefits of Homeownership

The value in homeownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate.

Minorities and Homeownership

Minorities tend to have lower homeownership rates than Whites. In 2010 in the Urban County, Whites had a homeownership rate of 90.1%. By comparison, Blacks owned their homes at a rate of 71.7% and Hispanics at a rate of 84.0%. Asians, however, had a higher home ownership rate than Whites at 95.0%. In 2000, Whites owned their homes at a rate of 86.0%; Blacks at a rate of 70.7%, Hispanics at a rate of 81.5%, and Asians at a rate of 85.8%, showing homeownership rate increases were not consistent across races and ethnicities between 2000 and 2010.

As previously noted, median incomes for Hispanics and Blacks are significantly lower than those of Whites. This is one among several factors that contribute to the generally lower rates of homeownership for minorities across the Urban County. This trend is strikingly evident in the Urban County's RCAPs, where the overall homeownership rate was only 59.7% in 2010.

Minority Homeownership by Jurisdiction

Among municipalities in the Urban County, minority homeownership varied widely, as illustrated in Figure 2-22. Many villages, cities and townships reported no minority households at all. Of those that did, many of the areas with fewer than 100 households reported minority homeownership rates of 100%. For example, 100% of the 24 Black households and the 34 Hispanic households in Green Garden Township own their homes.

Other areas of the Urban County in which large populations of minority households reside showed significantly lower rates of homeownership. University Park's 2,264 Black households had a homeownership rate of 57.9%, for instance, and only 60.0% of Rockdale's Hispanic households were homeowners.

Figure 2-22
Housing Tenure by Race and Ethnicity, 2010

| | White | | Black | | Asian | | Hispanic | |
|------------------------|----------------|--------------|---------------|--------------|--------------|--------------|---------------|--------------|
| | HHs | % Owners | HHs | % Owners | HHs | % Owners | HHs | % Owners |
| Will County | 177,279 | 88.6% | 23,412 | 58.6% | 7,838 | 94.7% | 23,226 | 77.1% |
| Urban County*** | 127,917 | 90.1% | 13,456 | 71.7% | 4,447 | 95.0% | 13,437 | 84.0% |
| Aurora City* | 2,221 | 94.1% | 354 | 73.2% | 565 | 100.0% | 368 | 88.9% |
| Beecher Village | 1,449 | 87.4% | 86 | 100.0% | 36 | 0.0% | 34 | 100.0% |
| Bolingbrook Village | 13,405 | 88.4% | 4,240 | 78.0% | 1,978 | 95.9% | 3,845 | 77.7% |
| Braceville Village | 0 | - | 0 | - | 0 | - | 0 | - |
| Braidwood City | 2,277 | 86.3% | 0 | - | 0 | - | 18 | 100.0% |
| Channahon Township | 319 | 100.0% | 0 | - | 0 | - | 0 | - |
| Channahon Village | 2,861 | 94.7% | 29 | 100.0% | 10 | 100.0% | 54 | 94.4% |
| Coal City Village | 0 | - | 0 | - | 0 | - | 0 | - |
| Crest Hill City | 6,424 | 81.4% | 655 | 14.0% | 140 | 85.0% | 790 | 72.8% |
| Crete Township | 3,111 | 94.8% | 359 | 96.1% | 0 | - | 53 | 100.0% |
| Crete Village | 2,578 | 90.8% | 823 | 85.4% | 26 | 100.0% | 114 | 100.0% |
| Custer Township | 519 | 86.5% | 0 | - | 11 | 100.0% | 10 | 100.0% |
| Diamond Village** | 2 | 100.0% | 0 | - | 0 | - | 0 | - |
| DuPage Township | 902 | 96.3% | 13 | 0.0% | 32 | 100.0% | 43 | 100.0% |
| Elwood Village | 876 | 88.2% | 0 | - | 0 | - | 28 | 100.0% |
| Florence Township | 210 | 100.0% | 0 | - | 0 | - | 0 | - |
| Frankfort Township | 4,797 | 97.6% | 55 | 100.0% | 50 | 92.0% | 156 | 100.0% |
| Frankfort Village | 4,834 | 96.9% | 345 | 100.0% | 121 | 89.3% | 195 | 100.0% |
| Godley Village | 216 | 54.6% | 0 | - | 0 | - | 37 | 56.8% |
| Green Garden Township | 1,158 | 93.4% | 24 | 100.0% | 0 | - | 34 | 100.0% |
| Homer Glen Village | 7,344 | 94.7% | 108 | 100.0% | 203 | 100.0% | 197 | 93.9% |
| Homer Township | 1,261 | 95.9% | 0 | - | 0 | - | 39 | 100.0% |
| Jackson Township | 585 | 90.1% | 0 | - | 0 | - | 36 | 69.4% |
| Joliet City* | 32,010 | 81.4% | 7,478 | 41.4% | 698 | 85.5% | 8,791 | 65.4% |
| Joliet Township | 2,827 | 76.6% | 1,295 | 58.9% | 0 | - | 899 | 77.0% |
| Lemont Village** | 0 | - | 0 | - | 0 | - | 0 | - |
| Lockport City | 8,125 | 89.2% | 93 | 41.9% | 35 | 100.0% | 512 | 85.2% |
| Lockport Township | 3,235 | 90.4% | 595 | 68.6% | 103 | 74.8% | 244 | 91.0% |
| Manhattan Township | 784 | 90.9% | 0 | - | 0 | - | 0 | - |
| Manhattan Village | 2,231 | 90.2% | 16 | 100.0% | 0 | - | 69 | 100.0% |

continued ...

| | White | | Black | | Asian | | Hispanic | |
|-------------------------|--------|-----------|-------|-----------|-------|-----------|----------|-----------|
| | HHs | % Ow ners | HHs | % Ow ners | HHs | % Ow ners | HHs | % Ow ners |
| Matteson Village | 11 | 100.0% | 12 | 100.0% | 0 | - | 0 | - |
| Minooka Village | 533 | 97.4% | 0 | - | 8 | 100.0% | 0 | - |
| Mokena Village | 5,684 | 90.0% | 33 | 100.0% | 25 | 100.0% | 318 | 60.7% |
| Monee Tow nship | 436 | 91.1% | 75 | 100.0% | 0 | - | 10 | 100.0% |
| Monee Village | 1,673 | 91.8% | 166 | 100.0% | 0 | - | 140 | 50.7% |
| Naperville City* | 10,898 | 94.4% | 386 | 80.6% | 1,940 | 96.0% | 423 | 92.2% |
| New Lenox Tow nship | 3,608 | 95.6% | 0 | - | 0 | - | 177 | 100.0% |
| New Lenox Village | 7,621 | 90.6% | 1 | 100.0% | 23 | 56.5% | 252 | 81.7% |
| Orland Park Village** | 139 | 20.9% | 0 | - | 0 | - | 0 | - |
| Park Forest Village** | 401 | 82.3% | 854 | 35.9% | 6 | 100.0% | 34 | 76.5% |
| Peotone Tow nship | 285 | 72.6% | 0 | - | 0 | - | 0 | - |
| Peotone Village | 1,684 | 85.9% | 0 | - | 10 | 100.0% | 0 | - |
| Plainfield Tow nship | 4,064 | 96.1% | 221 | 80.1% | 92 | 100.0% | 534 | 87.3% |
| Plainfield Village | 8,537 | 89.2% | 427 | 83.1% | 697 | 100.0% | 869 | 79.5% |
| Reed Tow nship | 91 | 100.0% | 0 | - | 0 | - | 0 | - |
| Rockdale Village | 738 | 58.5% | 7 | 100.0% | 0 | - | 180 | 60.0% |
| Romeoville Village | 8,170 | 91.2% | 1,278 | 74.4% | 612 | 100.0% | 2,790 | 94.1% |
| Sauk Village | 0 | - | 0 | - | 0 | - | 0 | - |
| Shorewood Village | 4,665 | 91.4% | 214 | 100.0% | 81 | 100.0% | 497 | 100.0% |
| Steger Village** | 1,730 | 65.3% | 825 | 4.7% | 29 | 44.8% | 126 | 56.3% |
| Symerton Village | 29 | 89.7% | 0 | - | 0 | - | 0 | - |
| Tinley Park Village** | 1,944 | 98.1% | 59 | 100.0% | 153 | 100.0% | 47 | 100.0% |
| Troy Tow nship | 1,108 | 98.1% | 0 | - | 26 | 100.0% | 69 | 100.0% |
| University Park Village | 259 | 52.5% | 2,264 | 57.9% | 38 | 13.2% | 38 | 84.2% |
| Washington Tow nship | 507 | 86.2% | 0 | - | 0 | - | 7 | 100.0% |
| Wesley Tow nship | 838 | 87.9% | 0 | - | 0 | - | 10 | 100.0% |
| Wheatland Tow nship | 1,710 | 96.0% | 22 | 100.0% | 90 | 100.0% | 64 | 100.0% |
| Will Tow nship | 409 | 93.9% | 0 | - | 0 | - | 0 | - |
| Wilmington City | 2,197 | 74.0% | 0 | - | 0 | - | 75 | 100.0% |
| Wilmington Tow nship | 405 | 80.7% | 0 | - | 0 | - | 0 | - |
| Wilton Tow nship | 327 | 82.9% | 0 | - | 0 | - | 0 | - |
| Woodridge Village** | 17 | 100.0% | 0 | - | 0 | - | 0 | - |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, 2006-10 American Community Survey (B25003A, B25003B, B25003D, B25003I)



Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites.

Among minorities in the Urban County, 71.1% of Blacks and 84% of Hispanics were home owners compared to 90.1% of Whites.

4. The Tendency of the Protected Classes to Live in Larger Households Household Size and Fair Housing

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or

not children are present, can face fair housing impediments. If there are policies or programs that restrict the number of persons that can live together in a single housing unit (instead of basing occupancy standards on the number of bedrooms in a unit), there is a fair housing concern because the restriction creates an unbalanced negative impact on individuals in large families, who may be members of a protected class.

Household Size in the Urban County

In the Urban County, minorities were more likely than Whites to live in families with three or more people. In 2010, 62.9% of White families had three or more people. By comparison, 73.2% of Black families, 79.8% of Asian families and 85.7% of Hispanic families were considered large. This calculation does not consider non-family households.

Figure 2-23

Family Households with Three or More Persons by Tenure, 2010

| | Percent of Owner-Occupied Homes with Three or More Residents | | Percent of Renter-Occupied Homes with Three or More Residents | |
|--------------|--|---------------|---|---------------|
| | Will County | Urban County* | Will County | Urban County* |
| White | 51.9% | 50.5% | 37.7% | 37.5% |
| Black | 59.4% | 60.4% | 47.9% | 53.8% |
| Asian | 76.9% | 74.6% | 53.6% | 49.0% |
| Hispanic | 80.1% | 79.1% | 71.2% | 69.5% |
| Total | 54.8% | 53.2% | 43.7% | 43.4% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Note: Sample size for other racial groups was not sufficiently large for reliable analysis.

Source: U.S. Census Bureau, Census 2010 (SF1; H16, H16A, H16B, H16D, and H16I)

Housing Stock in the Urban County

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In the Urban County, there are fewer options to rent a unit to accommodate large families. Of 17,904 rental units in 2010, only 32.1% had three or more bedrooms, compared to 84.4% of the owner housing stock.

Figure 2-24

Unit Size by Tenure, 2010

| | Renter-Occupied Housing Stock | | Owner-Occupied Housing Stock | |
|---------------------------|-------------------------------|----------------|------------------------------|----------------|
| | # units | % of all units | # units | % of all units |
| Urban County* | | | | |
| 0-1 bedroom | 5,033 | 28.1% | 1,126 | 0.8% |
| 2 bedrooms | 7,117 | 39.8% | 19,890 | 14.7% |
| 3 or more bedrooms | 5,754 | 32.1% | 113,891 | 84.4% |
| Total | 17,904 | 100.0% | 134,907 | 100.0% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Source: U.S. Census Bureau, 2006-10 American Community Survey (B25042)

5. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in higher-cost areas.

Between 2000 and 2010, median housing value (adjusted for inflation to 2010 dollars using Bureau of Labor Statistics [BLS] indices) increased 19.1% across Will County, while real median income decreased 17.0%. Median gross rent rose 7.9% over rent in 2000. The increase in median housing value and median gross rent paired with a fall in real income means that housing costs are outpacing income.

Figure 2-25

Trends in Housing Value, Rent and Income, 2000-2010

| | Median Housing Value (in 2010 \$) | Median Gross Rent (in 2010 \$) | Median Household Income (in 2010 \$) |
|---------------|--------------------------------------|-----------------------------------|---|
| 2000 | \$ 201,957 | \$ 825 | \$ 91,460 |
| 2010 | \$ 240,500 | \$ 890 | \$ 75,906 |
| Change | 19.1% | 7.9% | -17.0% |

Sources: U.S. Census Bureau, Census 2000 (SF3; H76, H63, P53), 2006-10

American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

Between 2000 and 2010, real median housing value increased 19.1% and median gross rent increased 7.9%, while median household income shrunk by 17%.

a. Rental Housing

Affordability and Income

A household earning the median income in Will County (\$75,906) could afford a maximum gross rent of \$1,898. The maximum affordable gross rent varies according to household race and ethnicity: A household making the median income for Asian households could afford a maximum gross rent of \$2,501; compared to \$1,972, \$1,543, and \$1,305 for a household making the median income for White, Hispanic, and Black households, respectively.

Loss of Affordable Rentals

The number of affordable rental units in the Urban County declined between 2000 and 2010. The number of units renting for less than \$500 fell by more than half (51.8%). During the same time, the number of units renting for more than \$1,000 per month increased from 2,102 to 5,778, or 274.9%. The data does not provide a distinction between units that were actually lost from the inventory (through demolition, etc.) and those for which rents were increased. This figure should be analyzed with an understanding that \$500 was worth more in 2000 than in 2010,

due to inflation.⁵ This figure, due to the categorical nature of the variable, cannot be adjusted for inflation.

Figure 2-26
Trends in Rents, 2000-2010

| Units Renting for: | 2000 | 2009 | Change | |
|----------------------|-------|-------|--------|--------|
| | | | # | % |
| <i>Urban County*</i> | | | | |
| Less than \$500 | 2,555 | 1,232 | -1,323 | -51.8% |
| \$500 to \$699 | 5,558 | 2,220 | -3,338 | -60.1% |
| \$700 to \$999 | 4,361 | 5,833 | 1,472 | 33.8% |
| \$1,000 or more | 2,102 | 7,880 | 5,778 | 274.9% |

* Excludes those parts of Aurora, Diamond, Joliet, Lemont, Naperville, Orland Park, Park Forest, Steger, Tinley Park, and Woodridge within Will County

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2006-10 American Community Survey (B25063)



The Urban County lost more than half its units renting for less than \$500 between 2000 and 2010. By comparison, the number of units renting for more than \$1,000 more than tripled.

Loss was due to actual removal from the inventory or price increase.

Fair Market Rent and Affordability

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2012. In Will County, the FMR for a two-bedroom apartment is \$958. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$3,193 monthly or \$38,320 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into an hourly wage of \$18.42.

In Will County, a minimum-wage worker earns an hourly wage of \$8.25. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 89 hours per week, 52 weeks per year.



Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Will County.

⁵ \$500 in 2000 is worth \$633 in 2010 dollars, according to BLS inflation indices.

b. Sales Housing

Affordability and Income

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is possible also to determine the affordability of the housing market for each racial or ethnic group in the County. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30 year fixed rate loan at a 4.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were levied at 1.628%, and
- \$500 of additional consumer debt was assumed

Figure 2-27 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians and Hispanics in Will County (income estimates were not available for the Urban County).

In Will County, the 2010 median sales price for single-family homes was \$189,900. The countywide median household income in 2010 was \$75,906, which translates to a maximum affordable purchase price of \$289,900. The fact that the median income would allow a household to afford a home at the median sales price suggests that the County is a generally affordable market, and that home ownership opportunities should be easier for those at or below the median household income level.

Affordability by Race and Ethnicity

The maximum affordable home purchase prices for White and Asian households were substantially higher than the affordable home prices for Black and Hispanic homebuyers. The maximum affordable purchase price at the median household income for Blacks and Hispanics was more than \$88,000 below that of White households. It was also 58% and 74%, respectively, of the maximum affordable purchase price countywide.

While Hispanic homebuyers have a maximum affordable purchase price above the 2012 median sales price for single-family homes in Will County, Black households' affordable purchase price is below the median sales price. As a result, Black homebuyers will have fewer options across the County.

Figure 2-27
Maximum Affordable Purchase Price by Race/Ethnicity, 2010

| | Median Household Income | Monthly Mortgage Payment | | | | Maximum Affordable Purchase Price |
|--|-------------------------|-------------------------------|-------------------|-----------------------------|--------------------|-----------------------------------|
| | | Mortgage Principal & Interest | Real Estate Taxes | Homeowner's Insurance & PMI | Total PITI Payment | |
| Will County | \$75,906 | \$1,242 | \$392 | \$80 | \$2,214 | \$289,000 |
| Whites | \$78,878 | \$1,308 | \$413 | \$80 | \$2,301 | \$304,350 |
| Blacks | \$52,196 | \$716 | \$226 | \$80 | \$1,522 | \$166,700 |
| Asians | \$100,050 | \$1,777 | \$561 | \$80 | \$2,918 | \$413,600 |
| Hispanics | \$61,708 | \$927 | \$293 | \$80 | \$1,800 | \$215,775 |
| 2012 Median Sales Price for Single-Family Home: \$189,900 | | | | | | |

Sources: 2006-10 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I); 2005 Will County Analysis of Impediments; TREND Multiple Listing Service, Calculations by Mullin & Loneragan Associates, Inc.



The maximum affordable home purchase price for Black households, based on group median incomes, is \$23,200 less than the 2012 median sales price for a single-family home in Will County.

Purchase Price

According to local real estate information, the ten highest median home prices based on recent sales by jurisdiction in August, 2012 were as follows:

- Frankfort \$300,000
- Bolingbrook \$210,750
- Homer Glen \$281,500
- Manhattan \$202,500
- Custer Park \$242,500
- Plainfield \$200,000
- New Lenox \$236,500
- Verona \$197,750
- Shorewood \$235,500
- Channahon \$190,000

Conversely, the following jurisdictions were the most affordable:

- Rockdale \$65,000
- Gardner \$117,000
- Joliet \$121,950
- Crest Hill \$124,950
- Braidwood \$125,000
- Wilmington \$130,000
- Godley \$134,500
- Elwood \$142,500
- Diamond \$145,000
- Romeoville \$151,500

Half of the most affordable municipalities are in the rural southern portion of the County, away from transportation and jobs. Additionally, four of the most affordable municipalities included racially/ethnically concentrated areas of poverty. These were Rockdale, Joliet, Crest Hill and Romeoville. One of the highest priced municipalities, Bolingbrook, included a racially/ethnically concentrated area of poverty.

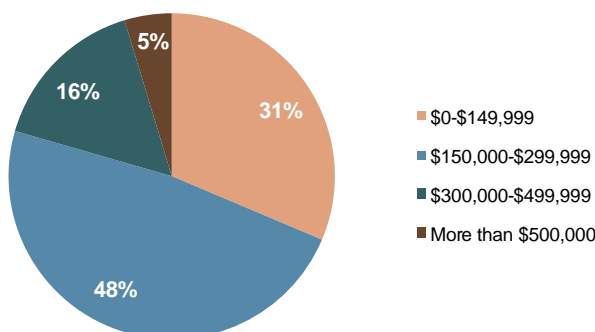
According to sales data, the maximum affordable purchase price of \$166,700 for median income Black households would allow that population to purchase a median priced home in the ten lowest-priced municipalities in the County. Only 31% of homes sold between 2011 and 2012 were below \$150,000, making them affordable for the Black purchasers at the median income or below.

The maximum affordable purchase price of \$215,775 for median income Hispanic households would limit that group from purchasing an affordable home in the five highest-cost municipalities in Will County. Just over half of the homes in Will County, 53.8%, were sold below \$200,000 in 2012, limiting Hispanic households at the median income or below in search of affordable housing.

The map on the following page illustrates the locations in Will County in which Black and Hispanic residents have a high percentage of homeownership.

Figure 2-28

Percent of Homes Sold per Price Range, 2011-2012



Source: TREND Multiple Listing Service

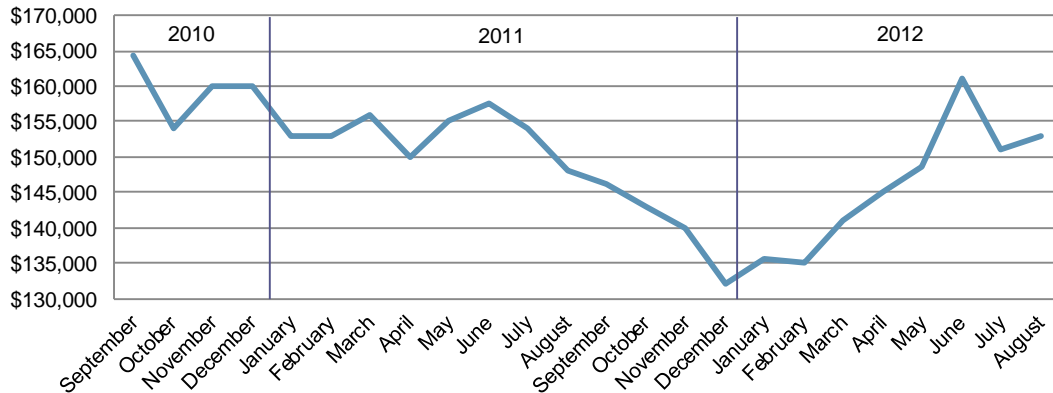
In general, a decline in the median price of homes sold indicates an expansion of opportunity for potential buyers at or below the median income, who have access to a supply of housing that may have been out of reach when prices hit their peak earlier in the decade. Conversely, an increase in sales price would indicate that LMI persons would have less access to affordable housing.

Home prices in Will County are significantly lower now than prior to the recession, having peaked at roughly \$220,000 in January of 2007 and falling to a low of \$132,000 in December, 2012. While median home

sale prices are still lower than their peak price, they have begun a recent climb.

Figure 2-29

Trends in Single-Family Residential Sales Prices, 2010-2012



Source: TREND Multiple Listing Service

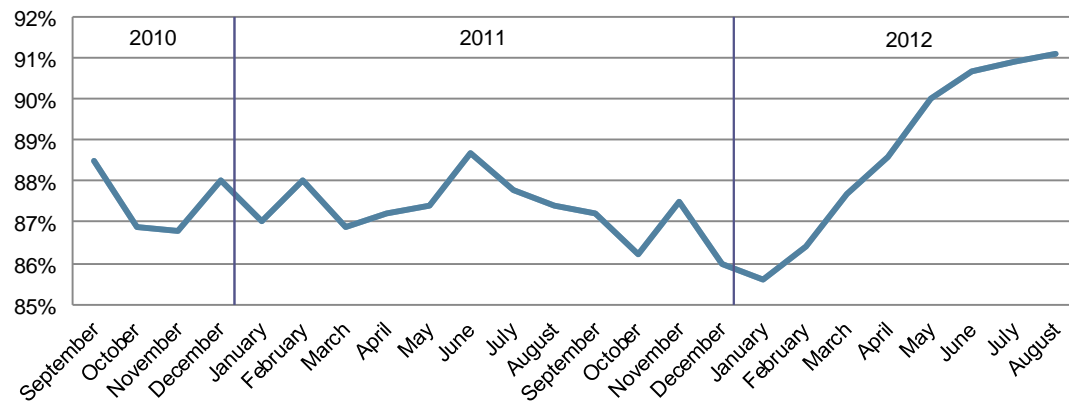


Reflecting national trends, median sales prices in Will County are significantly lower in 2012 than at the peak of the housing market. This provides lower-income buyers greater access to a range of housing.

While the price of homes has begun a recent and varied climb, the percent of list price that sellers are receiving when selling a home has undeniably climbed since the beginning of 2012. After hitting a two-year low of 85.6% in January, buyers are now paying 91.1% of a home's list price. This signals a strengthening housing market in Will County.

Figure 2-30

Sales Price as a Percentage of List Price, 2010-2012



Source: TREND Multiple Listing Service

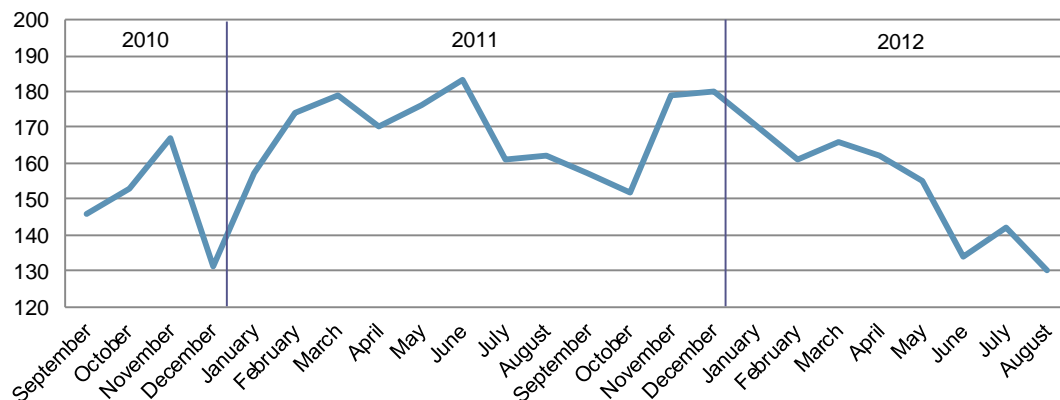
Days on Market

The number of days on the market a property sits before being sold is another gauge for determining the strength of an area's housing market. If units are sitting on the market for long periods of time, it signals a soft market. Conversely, if properties are quickly being purchased, it shows a higher demand.

In Will County, the number of days a house sits on the market is at its lowest level since 2007. After hitting a high of 180 days average on the market, units are now, on average, selling after 130 days. This indicates that homes are selling more quickly and the housing market is improving.

Figure 2-31

Average Number of Days on Market, 2010-2012



Source: TREND Multiple Listing Service



The increasing sales price as a percent of list price and lower average number of days on market signals a strengthening housing market in Will County.

6. Housing Market Analysis

Household Growth and Housing Availability

Previous analysis of household growth has shown that the County's growth at 34.4% significantly outpaces the State's 5.3% growth. Within the County, minorities are growing at a faster rate than the White population. Minority populations, which tend to live in larger households and have lower median family incomes, will require housing to fit their needs.

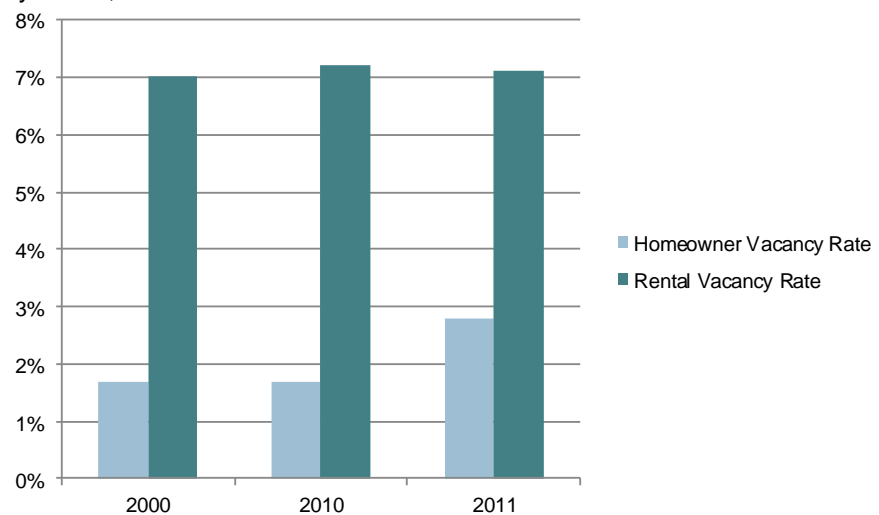
Vacancy

Homeowner vacancy rates and rental vacancy rates show different patterns of change over the last decade. Homeowner vacancy rates stayed constant at 1.7% despite huge increases in the housing stock between 2000 and 2010, but increased in 2011 to 2.8%. A 2.8% vacancy rate is an extremely tight market for single-family housing.

Rental vacancies have remained virtually unchanged since 2000, hovering around 7%. This is a healthy vacancy rate that allows for mobility among renters, but it is in contrast to national trends that show the rental market tightening as a result of the recession.

Figure 2-32

Vacancy Rates, 2000-2011



Source: U.S. Census Bureau, Census 2000 (SF3, DP-4), Census 2010 (SF1, DP04), 2011 American Community Survey (DP04)

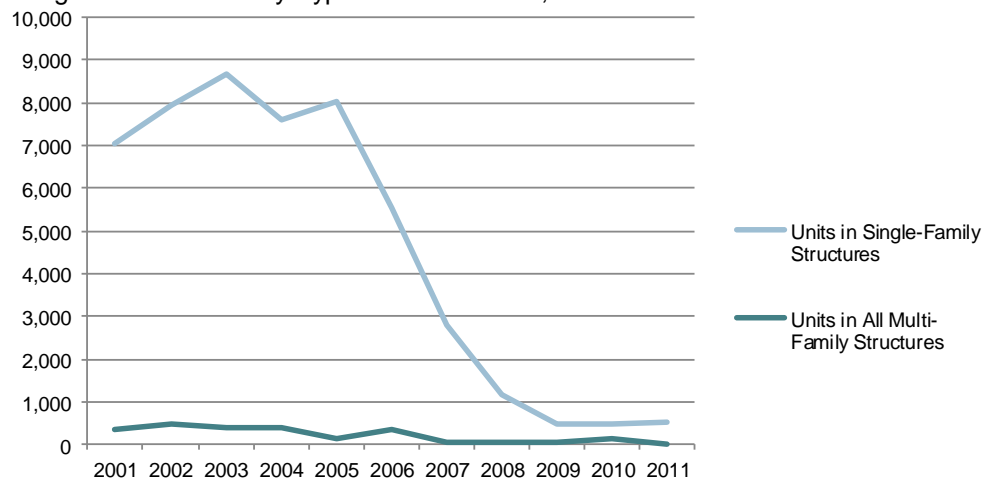
Building Permits

Consistent with the national recession and housing bust, building permits in Will County for single-family structures have declined dramatically. Similarly, building permits for multi-family structures have declined from a high of 474 in 2002 to a low of 12 in 2011.

The lack of new construction of multi-family structures, despite the increase in minority population means the housing market is tightening for affordable rental units.

Figure 2-33

Building Permits Issued by Type of Construction, 2010-2012



Source: HUD, State of the Cities Data System, 2012



Building permits for multi-family structures have decreased from a high of 474 in 2002 to a low of 12 in 2011.

This could lead to a tightening of the rental market in Will County.

3. Housing Discrimination Complaints

This section analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

Citizens of Will County receive fair housing services from a variety of organizations, including but not limited to the Illinois Department of Human Rights, Prairie State Legal Services, and the South Suburban Housing Center. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing, and/or work to promote a mutual understanding of diversity among residents.

A. Existence of Fair Housing Complaints

The number of complaints reported may under-represent the actual occurrence of housing discrimination in any given community, as persons may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

1. U.S. Department of Housing and Urban Development

HUD refers complaints of housing discrimination that it receives from Illinois to the Illinois Department of Human Rights for investigation.

2. Illinois Department of Human Rights

Overview of Data

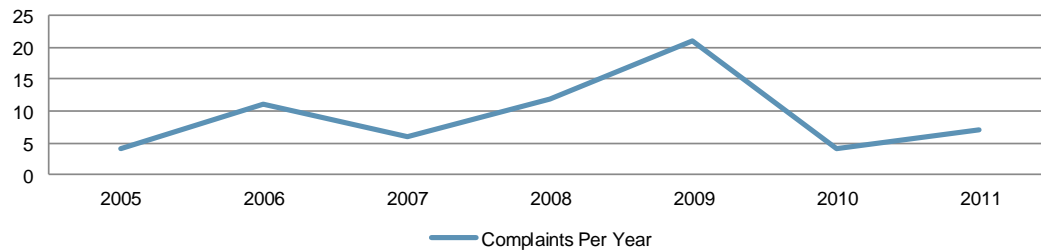
The Illinois Department of Human Rights (IDHR) provided data on housing complaints originating in Will County between April 2005 and June 2012. During these eight years, there were 68 filings, equivalent to an average of about nine cases per year.

Location of Complaints

Data was not available for the location where discrimination was alleged to have occurred. Rather, information showed where the entity charged with discrimination was based. Within Will County, the highest number of complaints came in the City of Joliet, accounting for roughly one third of all complaints. The next highest location of complaints was Crest Hill, with 12 complaints or almost 18% of the total. Other areas with more than five complaints included Woodridge, Romeoville and Bolingbrook.

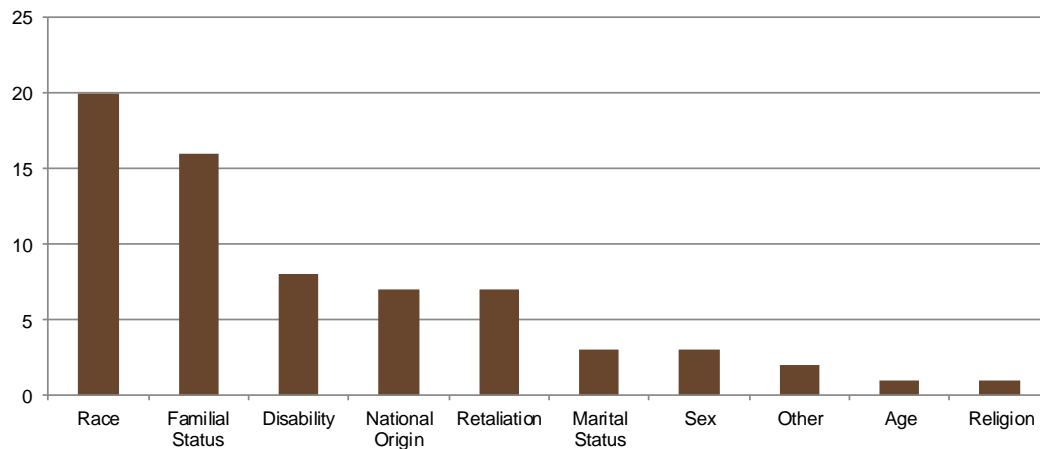
Data on complaints for other Illinois counties was not available for comparison; however, comparison would be limited due to the availability or absence of other means of complaint. A higher or lower rate of IDHR filings does not necessarily indicate more or less discrimination. The number of cases per year and the bases for complaints are summarized in the following charts.

Figure 3-1
Number of IDHR Complaints per Year, 2005-2011



Source: Illinois Department of Human Rights

Figure 3-2
IDHR Complaints in Will County by Basis of Discrimination, 2005-2012



Source: Illinois Department of Human Rights

Basis of Discrimination

Of the 68 total filings with the IDHR, 29.4% alleged discrimination on the basis of race, 23.5% on the basis of familial status, 11.8% on the basis of disability, 10.3% each on the bases of national origin and retaliation (taking an adverse action after an individual exercises a fair housing right).



Across Will County, race and familial status were the primary bases for fair housing complaints to the Illinois Department of Human Rights between 2005 and 2012.

More than half of all fair housing complaints involved issues of race, familial status or both.

Issue of Complaints

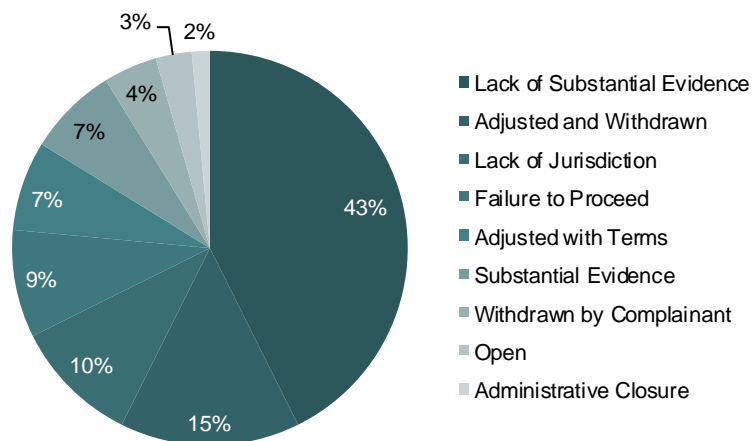
The majority of the total 68 complaints alleged discrimination in the terms of a rental, accounting for 57.4% of all complaints. An additional ten complaints, or 14.7% of the total, alleged a failure to rent. Of the remaining complaints, 8.8% were alleged on the basis of other civil rights violations and 5.9% were alleged on the basis of discrimination in a sales transaction. Three complaints were related to a failure to accommodate, whether in a sales or rental situation. The remaining cases cited a variety of other problems.

Resolution of Complaints

All but two of the 68 complaints filed with IDHR were closed as of July 2012. The largest percent of cases were closed because there was a lack of substantial evidence (42.6%). An additional ten cases, or 14.7%, were adjusted and withdrawn, and a further seven cases, or 10.3%, were closed due to lack of jurisdiction. The remaining cases were closed for a variety of reasons. Each reason consisted of less than 10% of total cases. Reasons included applicants failing to proceed with the complaint, withdrawal, or administrative closure. Five cases were concluded with substantial evidence of discrimination, but no description of conciliation agreements signed by the parties involved.

Figure 3-3

Resolution of IDHR Complaints in Will County, 2005-2012



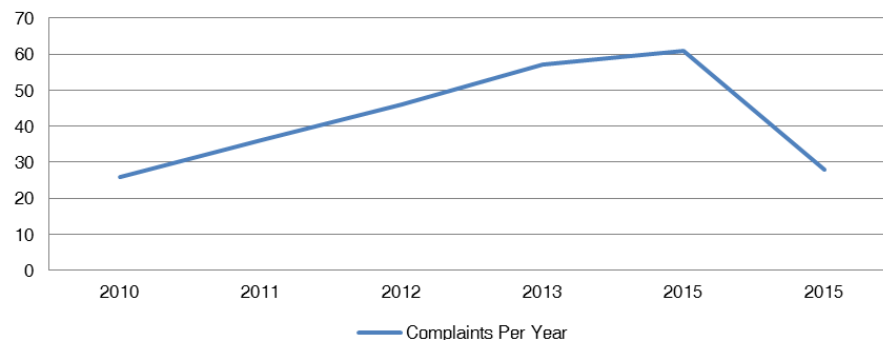
Source: Illinois Department of Human Rights

Of the 15 cases that ended in adjustments, a third involved race (5); four involved familial status; three involved national origin; two involved marital status; and the remaining one involved disability.

Updated IDHR Complaints

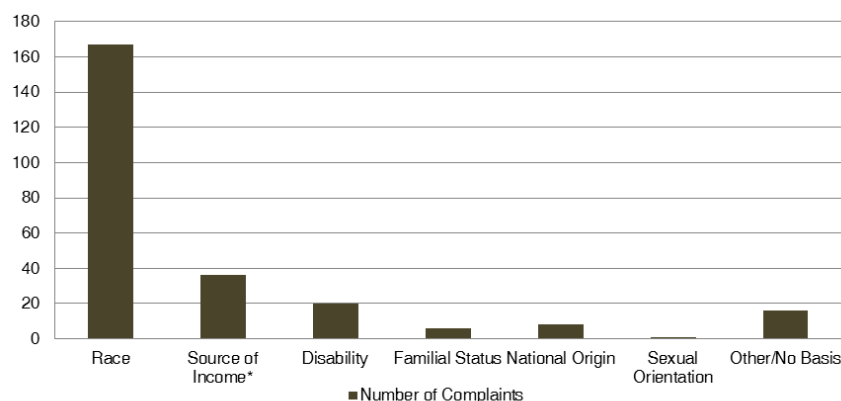
Updated complaints were provided by the South Suburban Housing Center in early 2016, after the initial draft of this document was completed. These complaints covered a time period between 8/29/2012 and 10/19/2015. Of the 12 complaints filed during this time period, 4 (33%) were filed on the basis of race; 4 (33%) were filed on the basis of disability, 3 (25%) were filed on the basis of sex; and 1 (8%) claim was filed on the basis of retaliation. Two cases were closed with substantial evidence of discrimination, one on the basis of race and the other on the basis of sex, but no description of conciliation agreements was available. Two cases were dismissed due to lack of substantial evidence; three cases were closed due to the claimants failing to proceed with the complaint; one case was adjusted and withdrawn; and one case was adjusted with terms of settlement and agreement. Three cases remained open. These results do not vary greatly from the earlier data analyzed above. The figures below illustrate trends in housing complaints from 2010 to 2015.

Figure 3-4
IDHR Complaints in Will County Per Year, 2010-2015



Source: South Suburban Housing Center

Figure 3-5
IDHR Complaints in Will County by Basis of Discrimination, 2010-2015



Source: South Suburban Housing Center

*Not recognized by all Will County jurisdictions.

B. Testing

South Suburban Housing Center (SSHC) is a regional fair housing enforcement and counseling agency that serves all of Will County. SSHC conducted a total of 165 fair housing tests between 2010 and 2015. Results were not provided.

C. Existence of Fair Housing Discrimination Suit

There is no pending fair housing discrimination suit involving Will County.

D. Determination of Unlawful Segregation

There is no pending unlawful segregation order involving Will County.

4. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the Urban County to determine opportunities for furthering the expansion of fair housing choice.

A. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower-income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

Federal Entitlement Programs

Will County's federal entitlement funds received from HUD may be used for a variety of activities to serve a variety of needs, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- The Neighborhood Stabilization Program (NSP) was established for the purpose of stabilizing communities that have suffered from foreclosures and abandonment. Through the purchase and redevelopment of foreclosed and abandoned homes and residential properties, the goal of the program is being realized. NSP1, a term

that references the NSP funds authorized under Division B, Title III of the Housing and Economic Recovery Act (HERA) of 2008, provides grants to all states and selected local governments on a formula basis.

Across all formula grant funding sources, the County allocated \$556,913 in FY 2011 funds for a variety of activities related to the expansion of housing opportunities, including tenant-based rental assistance for the elderly and persons with disabilities, and downpayment assistance.

Pure Fair Housing Activities

In 2010, the County's CDBG budget included an allocation for fair housing activities. This amounted to \$5,000 for fair housing programs, and is equivalent to 0.2% of the total Urban County FY 2010 CDBG entitlement grant of \$1,694,000. Those funds were allocated to the Will County Center for Community Concerns for the purchase of a software module which allowed the County to fund the www.willfindhousing.org website. The website is a resource to find affordable housing in Will County. While not a direct fair housing activity, it has the potential to become a fair housing information resource.

The Urban County's CDBG funding decreased roughly \$300,000 between 2010 and 2011. In 2011, the fair housing activity line item was removed from the CDBG budget. According to interviews with Will County Land Use staff, funds for fair housing activities will be budgeted from administrative funds. Administrative funds decreased from \$319,000 in 2010 to \$265,000 in 2011.

1. Project Proposal and Selection

Responsible Party

The Will County Board of Commissioners is ultimately responsible for federal entitlement programs administered by the County. The lead agency in the planning and administration of these programs is the Will County Community Development Division of Land Use. Will County Land Use reviews all applications and makes recommendations to the Board of Commissioners relative to allocation decisions. The division compiles the Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The current Consolidated Plan is effective from 2010 to 2014.

Eligible Grantees

Will County allocates its formula grant funds on a competitive, application basis. Urban County CDBG and HOME projects generally occur within the County but outside of Joliet, Naperville and Aurora, which are federal entitlement communities in their own right. Additionally, projects occur outside of Diamond, Lemont, Orland Park, Park Forest, Steger, Tinley Park and Woodridge, which have opted out of the Urban County program to apply for funds available at the state level. During interviews, Land Use staff stated they occasionally use HOME funds for affordable housing within the City of Joliet for the benefit of Urban County residents.

Recently, the County entered into a joint agreement with Bolingbrook, a former entitlement community, to take over the community's CDBG program. Bolingbrook will retain its entitlement grant amount for two years while the County administers the grant. After the agreement ends, Bolingbrook will

relinquish its entitlement status, and its entitlement grant will be added to the Urban County's funds.

Objectives and Outcomes

In the FY 2010-2014 Consolidated Plan, the County identified three objectives for its federal programs. These include:

- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities for citizens

The Consolidated Plan further breaks down each objective to achieve three proposed outcomes: accessibility, affordability and sustainability.

Application Process for Funds

In FY 2011, Will County allocated \$1,389,600 in CDBG funds and \$602,113 in HOME funds. Those funds that released on a competitive basis are reviewed and scored during the application process. The County does not require fair housing training of potential funding recipients.



Presently, the County does not require fair housing training as part of the local application process for entitlement funds.

Providing mandatory fair housing training as a requirement to receive funds would educate local units of government about their obligation to affirmatively further fair housing.

Applications for the Community Development Block Grant program are evaluated according to standards set in the application packet and distributed to potential funding subrecipients. County staff members weigh each project using project threshold criteria explained in the packet. The scoring criteria include:

30 points: Project Impact

Example: will the project alleviate a known problem, is it a short- or long-term solution, is it consistent with a comprehensive plan

20 points: Need

Example: is there a need for this project, how will it benefit LMI residents, how was the need determined

20 points: Participants and Cost Estimates

Example: what is the total cost, how much money will the project leverage from other sources

20 points: Target Area Surveys

Example: does this project take place in an LMI census tract; if it does not, has a survey of impacted residents taken place



5 points: Work Schedule

Example: does the organization have the capacity to complete the project in the established timeframe

5 points: Major Environmental Review

Example: how complete of an environmental review has the project sponsor undertaken

Total: 100 Points

Applications for the HOME program are also evaluated according to standards set in the application packet that is distributed to potential funding subrecipients. County staff members weigh each project using project threshold criteria explained in the packet. Projects must receive a minimum of 70 points to be eligible for funding, and in the case of a tie, projects with a higher score for “ability to proceed” will be given priority. The scoring criteria include:

25 points: Project Summary

Example: description of the project, does it have a commitment of other funding, what are the project’s minority outreach and labor plans

5 points: Demographic Commitment

Example: does the project exclusively serve senior citizens, severely disabled persons, victims of domestic violence or homeless persons

20 points: Organizational Capacity and Relevant Experience

Example: what is the capacity of the organization and relevant experience with similar projects

20 points: Ability to Proceed

Example: does the project have site control, zoning, a complete environmental assessment, staffing and a complete funding plan

25 points: Leveraging of Funds

Example: what percent of project funding comes from other non-County funds

5 points: Major Environmental Issues Review

Example: how complete of an environmental review has the project sponsor undertaken

Total: 100 Points

Following initial scoring by internal staff, a ranked list of projects is presented to the Community Development Advisory Board. Other groups, such as municipalities and engineers are able to give presentations regarding the proposed projects and their ranking. With this information, staff reviews the projects and re-prioritizes them before presenting a finalized list to the Advisory Board for review and recommendation.



The County's scoring criteria does not include consideration of geographic location relative to areas of concentration of minorities and LMI persons.

Providing incentive to create affordable housing opportunities outside areas of concentration could expand housing choice for LMI minorities.

2. Affirmative Marketing Policy

Federal Requirements

The County is federally required to adopt affirmative marketing procedures and requirements for all CDBG and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the Urban County's policies
- A description of what the owners and/or the Urban County will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the Urban County will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Will County's Affirmative Marketing Plan

The County's Affirmative Marketing Plan for Affordable Housing Programs applies to all rental facilities with five or more units that are assisted by County HOME grants.

The Plan, as outlined in the County's Five-Year Consolidated Plan, requires that special marketing outreach consideration be given to those who are "not likely to apply without special outreach" in addition to advertising through major media outlets to reach the largest number of people. Finally, the plan requires that Project Sponsors keep records for compliance with these steps. The policy for monitoring actions taken is not outlined in the affirmative marketing plan.



The County's Affirmative Marketing Plan does not outline steps for monitoring subrecipients' marketing policies.

The lack of written monitoring policies could lead to less effective marketing campaigns for the protected groups least likely to apply for housing. Any monitoring policy should clearly state what corrective actions may be taken, including discontinuance of funding.

Subrecipients and the Affirmative Marketing Plan

According to the documents provided by Will County Land Use, Project Sponsors have utilized the Illinois Housing Development Authority's example form to record their affirmative marketing plan and actions. The Plan specifies that special marketing outreach consideration will be given to those groups "least likely" to apply for housing without special outreach, and offers White (non-Hispanic), Black/African Americans, American Indian/Alaskan Native, Asian, Hispanic/Latino, and Native Hawaiian/Pacific Islanders as options. It does not specify the criteria for deciding "least likely" other than saying Project Sponsors should consider factors such as cost of housing, location and proximity to public transit to determine least likely. Additionally, the form allows groups to enter other population groups that may be least likely to apply such as persons with physical disabilities and families with children.

In order to target these populations, the form requires project sponsors to contact local civic and community organizations representative of the area's diversity as well as groups representing the elderly and disabled. The form does not mention or specify that Project Sponsors must publish marketing materials in multiple languages in order to better reach potential applicants with language limitations.



Will County should consider creating an Affirmative Marketing Plan template for subrecipients to ensure information is available to all those seeking affordable housing.

Such a template could include additional guidance on identifying those with language barriers and others least likely to apply. It could also include guidance on best practices for advertising to those groups.

3. Grants to Local Units of Government

Competitive Municipal Grants Program

The County divides CDBG public infrastructure funds among communities on a competitive basis through the Competitive Municipal Grants program. In 2010, \$935,000 was allocated to the grant program; in 2011, \$550,000 was budgeted. Projects must be located in an LMI census tract or undergo a

targeted income survey to determine eligibility. Any jurisdiction receiving CDBG or HOME funding from the County is required to certify that it will affirmatively further fair housing and document the actions taken.

Municipal Grants and Fair Housing

According to the Will County CDBG and HOME applications, communities applying for funds must sign a fair housing agreement. This agreement states that subrecipients must be in compliance with all regulations, policies, guidelines and requirements regarding fair housing as a condition of receiving funding. Additionally, communities must participate in this analysis and must take appropriate actions to overcome identified impediments.

Beyond the statutory requirements for project eligibility, the County stipulates in its application appendices that communities participating in the CDBG and HOME programs undertake three specific actions:

- Have a zoning ordinance that is consistent with the Fair Housing Amendments Act of 1988, by addressing the issues of group homes and the definition of family (The County does not have a specific, written policy of refusing to grant CDBG and HOME funding to local units of government that engage in discriminatory zoning and land use practices)
- Have a Fair Housing Action Plan in place or in development
- Describe the steps the jurisdiction has performed or is performing to further fair housing in Will County

➤ Fair Housing Achievement

Will County recently added an addendum to their application packet stating that communities participating in the CDBG program must have a zoning ordinance consistent with the Fair Housing Act, have a Fair Housing Action Plan in place, and include a description of steps performed to further fair housing.

4. Spending Patterns

Entitlement jurisdictions are required to prepare Annual Plans describing activities that will be supported by federal entitlement grant funds. At the end of each fiscal year, jurisdictions prepare Consolidated Annual Performance and Evaluation Reports (CAPERs) to report progress. The following narrative includes an analysis of two years of the Urban County's investment of entitlement funds, as reported in these documents.

HOME Funds

Between FY 2010 and FY 2011, the Urban County's HOME funds decreased \$93,455 or 13.4% according to the County's annual plans. To compensate for that loss in funding, the County zeroed out funding for the construction of new homes and single family rehabilitations. It also increased downpayment assistance funds \$176,913 or 176%. While Community Housing Development Organization (CHDO) activities remained flat at \$80,000

between the two years, HOME administration funds decreased roughly \$5,000 while remaining roughly 7.5% of the County's total HOME allocation. Tenant Based Rental Assistance (TBRA), such as the Section 8 Housing Choice Voucher program, doubled between 2010 and 2011.

Figure 4-1
HOME Allocations, FY 2010 – 2011

| Program by Outcome and Objective | 2010 | | 2011 | |
|--|------------------|----------------------------|------------------|----------------------------|
| | | % of Total HOME Allocation | | % of Total HOME Allocation |
| Affordability of Decent Housing | \$565,011 | 81.2% | \$476,913 | 79.2% |
| Downpayment Assistance | \$100,000 | 14.4% | \$276,913 | 46.0% |
| New Home Construction | \$125,000 | 18.0% | \$0 | 0.0% |
| Single Family Rehabilitation | \$240,011 | 34.5% | \$0 | 0.0% |
| Tenant Based Rental Assistance (TBRA) | \$100,000 | 14.4% | \$200,000 | 33.2% |
| Accessibility of Decent Housing | \$80,000 | 11.5% | \$80,000 | 13.3% |
| CHDO Activity | \$80,000 | 11.5% | \$80,000 | 13.3% |
| HOME Administration | \$50,557 | 7.3% | \$45,200 | 7.5% |
| | \$695,568 | 100.0% | \$602,113 | 100.0% |

Source: FY 2010 and FY 2011 Action Plans

CDBG Funds

Between FY 2010 and FY 2011, the Urban County's CDBG funds decreased \$204,400 or 12.8%. To handle the loss in funding, the County substantially decreased the amount of funding awarded to municipalities through the Competitive Municipal Grants Program.

It also eliminated housing counseling and decreased education/job training assistance while increasing homeless assistance. According to the Action Plan, the County eliminated the Community Planning Assistance program it had funded.

The County's decrease in funding forced it to eliminate all fair housing activities money. Fair housing activities in 2010 accounted for 0.3% of the County's entitlement grant, or \$5,000. The funding was eventually reallocated for the creation of the www.WillFindHousing.org website. HUD generally looks for 1% to 3% of funds to be directed toward pure fair housing activities annually. Will County's budget included no allocation for such activities in 2011.

The County did not allocate CDBG funds for pure fair housing activities in 2011.

HUD generally looks for 1% to 3% of the annual CDBG entitlement to be directed toward pure fair housing activities, including fair housing education, outreach, testing and enforcement.

Figure 4-2
CDBG Allocations, FY 2010 - 2011

| Program by Outcome and Objective | 2010 | | 2011 | |
|----------------------------------|----------------------------|---------------|----------------------------|---------------|
| | % of Total CDBG Allocation | | % of Total CDBG Allocation | |
| Community Development | \$935,000 | 58.7% | \$550,000 | 39.6% |
| Competitive Municipal Grants | \$935,000 | 58.7% | \$550,000 | 39.6% |
| Public Service | \$240,000 | 15.1% | \$199,000 | 14.3% |
| Homeless Assistance | \$150,000 | 9.4% | \$166,000 | 11.9% |
| Housing Services & Counseling | \$40,000 | 2.5% | \$0 | 0.0% |
| Education/Job Training | \$50,000 | 3.1% | \$33,000 | 2.4% |
| Targeted Assistance | \$100,000 | 6.3% | \$375,000 | 27.0% |
| Clearance and Spot Blight | \$100,000 | 6.3% | \$50,000 | 3.6% |
| Lead Grant Match | \$0 | 0.0% | \$200,000 | 14.4% |
| IEPA Loan Debt Service | \$0 | 0.0% | \$125,000 | 9.0% |
| Administration | \$319,000 | 20.0% | \$265,600 | 19.1% |
| General CD Administration | \$310,000 | 19.4% | \$265,600 | 19.1% |
| Community Planning Assistance | \$4,000 | 0.3% | \$0 | 0.0% |
| Fair Housing Activities | \$5,000 | 0.3% | \$0 | 0.0% |
| | \$1,594,000* | 100.0% | \$1,389,600 | 100.0% |

* This total matches the sum of all proposed expenditures in 2010 and differs from the \$1,694,000 number listed in the FY 2010 Action Plan as the CDBG total

Source: FY 2010 and FY 2011 Action Plans

NSP Funds

Through the use of NSP funds, the County and its subrecipients rehabilitated roughly 100 homes, with an average unit selling for about \$140,000. The majority of homes were rehabilitated using a combination of NSP and HOME money. Map 4-2 illustrates the majority were concentrated outside of RCAPs especially between the northern edge of Joliet and the southern edge of Bolingbrook. The race of home buyers was generally scattered among various neighborhoods, with the exception of Hispanics, who are generally clustered together, although outside racially/ethnically concentrated areas of poverty and in close proximity to homes purchased by families of other races.

Female-headed households were generally clustered within transit accessible areas and within the ring around Joliet. Of those homes clustered around Joliet, 59% were occupied by female-headed household families while the cluster north of Joliet included 35% female-headed household families. Similarly, married households generally tended to cluster north of Joliet as well.

The maps on the following pages illustrate the location of NSP and HOME properties as well as the distribution of homebuyer type.

Fair Housing Achievement

NSP and HOME funds used for the rehabilitation of single-family homes benefited LMI minority households in neighborhoods in northern Will County.

B. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

Will County Commissioners appoint residents to serve on dozens of various boards and commissions focused on a wide range of issues. The following bodies are especially relevant to issues of fair housing; however, members of the board serve ex-officio and are not appointed.

1. Will County CDBG Advisory Board

The Will County CDBG Advisory Board establishes, reviews, amends and recommends to the County Board for final approval all Will County CDBG and HOME Program policies and manuals. It also handles requests for waivers of local policies and accepts and reviews applications for funding assistance for the CDBG and HOME Programs.

The CDBG Advisory Board is comprised of representatives from all County Board Districts in which an area qualifies for CDBG funding, to a maximum of eight persons. The County has five representatives on the Advisory Board, occupied by the County Executive, the Executive Committee Chair, the Majority Leader, the Minority Leader and a Board Member-at-Large. There is also a representative of a public housing authority and a not-for-profit agency. Total membership is 15.

Of the ten current members of the board, nine are non-Hispanic Whites and one is Black. Only one member is female, and there are no persons with disabilities on the board.

C. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

Federal law requires a certain percent of all public housing be accessible. These units fall under the Uniform Federal Accessibility Standards for accessible construction. A variety of organizations in Will County manage accessible housing and advocate for those with disabilities seeking housing.

1. Private Housing Stock

In Illinois, the Human Rights Act requires accessibility for persons with disabilities in certain multi-family dwellings built after March 13, 1991. This includes buildings of four or more units that have an elevator as well as ground-floor units in buildings of four or more units without an elevator. The Act's standards, detailed at 775 ILCS 5/3-102.1(C)(3), are consistent with those contained in the Illinois Accessibility Code for adaptable dwelling units.

The State is presently considering updating the Illinois Accessibility Code to 2012 or abandoning it in favor of the ADA requirements.

The Illinois Department of Human Rights encourages, but does not require, municipalities to determine whether the design and construction of newly constructed multi-family units meet state standards. Each local government that regulates design and construction does so according to its own adopted set of standards and procedures.

The Will County Land Use Department enforces the County's subdivision and building codes in the unincorporated areas of Will County. The County has three to four building inspectors serving the entire County and conducts inspections on a complaint basis.

The County also inspects new construction to ensure compliance with accessibility requirements. Surveys with service providers such as Prairie State Legal Services and Cornerstone revealed that lack of accessible housing is a barrier for persons with disabilities in Will County. Depending on the location of a project, the County may have no jurisdiction in terms of what code it can require when HOME funds are spent. Presently, the County is in the process of rewriting its building code.

The County does not currently have a rental inspection program. Such programs, like one in Joliet, require fair housing training as a component for landlords to obtain rental certification while also upgrading and preserving the rental housing stock. Such a program could be based on the 26 fire protection districts in the County.

2. Public Housing Stock

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

Housing Authority of Joliet

The Housing Authority of Joliet has prepared a Section 504 Needs Assessment and Transition Plan, which was reviewed during the AI process for the City of Joliet. The updated plan, completed in 2011, identified the need for structural alterations to existing units to achieve consistency with UFAS standards, as well as ADA, the Illinois Accessibility Code and ANSI A117.1-2003. The total cost for bringing all public housing into compliance is estimated at \$1.8 million. Renovations and updates are estimated to occur over the next three to five years.

➤ Fair Housing Achievement

The Housing Authority of Joliet recently completed a Section 504 Needs Assessment and Plan which outlined specific steps for updating the authority's buildings for compliance with accessibility standards. The updates are scheduled to occur over the next three to five years.

Aurora Housing Authority

According to AHA, its Section 504 Needs Assessment and Transition Plan is more than 10 years old. During its recent AI process, AHA agreed to update its Needs Assessment and Transition Plan, particularly in light of a proposed redevelopment project. This project will provide the opportunity for AHA to create new affordable rental units that are accessible to persons with disabilities.



In order to achieve compliance with accessibility regulations, AHA must develop a new Section 504 Needs Assessment and Transition Plan.

Using the UFAS accessibility standard, the assessment should evaluate accessibility needs in relation to AHA's plans for updating its housing stock. AHA should also solicit input from and/or collaborate with local advocacy organizations for persons with disabilities to complete the Section 504 process.

3. **Cornerstone Services, Inc.**

Since 1969, Cornerstone Services has been an advocate and provider of residential, behavioral health, training, employment, and other services for people with disabilities in the Will County area. Cornerstone is a designated Community Housing Development Organization (CHDO) through the HOME Program. The organization employs 410 full time staff, 121 part-time staff and six consultants who provide direct service to persons with disabilities.

As of October 2012, Cornerstone owned and managed 58 residential properties with roughly 281 units. Cornerstone partners with SSHC and the Will-Grundy Center for Independent Living to provide fair housing training for the Center's residential staff. The organization is also involved with the Will County Continuum of Care, is an active member of advocacy groups for persons with disabilities, and conducts outreach among area landlords to promote acceptance of persons with disabilities.

Cornerstone has adopted a marketing plan to affirmatively further fair housing. When a housing unit becomes available for a person with a developmental disability, Cornerstone notifies SERVICE of Will, Grundy, and Kankakee Counties, Inc., a pre-admission screening agency. SERVICE of Will, Grundy, and Kankakee Counties, Inc. receives referrals from a variety of sources, including school districts, health care providers, the Will County

Center for Community Concern, Crisis Line, area shelters, the Will-Grundy Center for Independent Living, and the Spanish Community Center. These sources receive information for marketing purposes from Cornerstone.

4. Will-Grundy Center for Independent Living

The Will-Grundy Center for Independent Living (CIL) is a community-based organization that serves Will and Grundy counties. CIL provides direct service to persons with disabilities in the bi-county region and is the primary resource for information on the Americans with Disabilities Act and other disability related laws.

Of CIL's 12 staff members, seven provide direct service such as skills training, information and referral, community re-integration, peer counseling, advocacy, and conducting workshops and seminars. CIL also receives fair housing complaints, particularly in cases involving accessibility. CIL staff work with complainants to conduct limited investigations of the complaints. CIL has an ongoing partnership with South Suburban Housing Center to provide fair housing enforcement advice and to refer fair housing complaints for testing and other investigation.

Also in partnership with SSHC, the CIL conducts fair housing education and outreach activities for clients. It also annually distributes fair housing accessibility information to architects, builders, multi-family residential developers, and municipal building inspectors.

D. Language Access Plan for Persons with Limited English Proficiency

Limited English Proficiency

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

Persons with LEP in Will County

As noted in an earlier section of this report, the number of LEP speakers of four different foreign language groups across Will County exceeds 1,000.⁶ However, given limitations in ACS data, it is not clear how many persons with LEP are in the Urban County versus the County overall.

Four-Factor Analysis

In Will County, each of these language groups includes more than 1,000 persons with LEP, exceeding HUD "safe harbor" minimums. In order to determine whether the translation of vital documents is required, the County

⁶ The 2010 American Community Survey reported a limited English-speaking ability among 30,031 Spanish speakers, 3,352 Polish speakers, 1,453 Chinese speakers, and 1,251 Tagalog speakers.

must conduct the four-factor analysis. The term “vital document” refers generally to any publication that is needed to gain access to the benefits of a program or service. The four-factor analysis requires entitlements such as the Urban County to evaluate the need for translation and/or other accommodations based on four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

Although there is no requirement to develop a Language Access Plan (LAP), HUD entitlement communities are responsible for serving persons with LEP in accordance with Title VI of the Civil Rights Act of 1964. Conducting the four-factor analysis is the best way to comply with this requirement. At present, Will County Land Use does not have a Language Access Plan.



The Will County Land Use Department does not presently have a Language Access Plan.

A Language Access Plan helps to identify the number of persons with limited English proficiency and addresses methods of improving access to County services.

E. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. The policies put forward in the plan will define the steps that local leaders will take to guide growth in the County. The land use recommendations define the location, type and character of future development, expressing the preferred density and intensity of existing and planned residential neighborhoods in the County. Taken together, these elements outline a vision for where people will live, how they will get around and the types of employment and recreational opportunities that will be available.

Will County Plan

The *Will County, Illinois: Land Resource Management Plan* is the latest guide for development across Will County communities. Adopted by the County Commissioners in 2002 and revised in 2011, this document serves to inform County decision-making and assists local governments in preparing their own, more detailed local plans in accordance with their own goals and land use policies. Will County only administers zoning for specific areas, and as such the plan does not seek to pre-empt the authority of local municipalities. Rather, the plan exists to guide regional growth, especially in

areas such as transportation and farmland preservation that transcend localized boundaries.

Plan Elements

The Plan consists of four main parts: the policy gateway, a forms concepts handbook, an open space element, and an airport environs element. In addition, the plan includes an attached *Fairmont Area Plan* and adopts as its transportation component the *Will County 2030 Transportation Plan*. The elements are described in greater detail below:

- **Policy Gateway:** This section outlines six community values that guide the comprehensive plan as well as goals and strategies to help maintain and strengthen them. Community values include:
 - Growth & Community Character
 - Intergovernmental Cooperation
 - Open Space & Environmental Preservation
 - Farming & Agriculture
 - Infrastructure
 - Economy
- **Forms and Concepts Handbook:** This section contains the future land use recommendations of the comprehensive plan. Because the County does not have land use authority except in particular areas, the comprehensive plan outlines “Development Forms” and “Development Use Concepts”:
 - **Development Forms:** These are broad land use categories such as “Rural Areas” and “Urban Communities” that give general overviews of the development style that should happen in each area.
 - **Development Use Concepts:** These are more localized development types, such as “multi-family complex” that give specific design guidelines for each use.
- **Open Space Element:** This section guides development and protection of open space in Will County.
- **Airport Environs Element:** This section contains specific recommendations and design principles for the area surrounding the proposed South Suburban Airport.
- **2030 Transportation Framework Plan:** The Will County Department of Highways’ 2030 Transportation Plan, including recommendations for transit, bikeways, pedestrians and roadways, is adopted as part of the Land Use Management Plan.

The plan is updated periodically to reflect changing conditions. It was last amended in January 2011.

The Will County Plan notes that the area is undergoing rapid and unprecedented changes. It recognizes that Will County is the fastest growing of the “collar counties” around Chicago, with population increasing from 350,000 in 1990 to 500,000 in 2000, more than 40%. The pace of development is only expected to increase. The Plan also estimates that of the 500,000 acres of land in Will County, only 20% is considered developed. The forecasts for growth, even under the most aggressive forecasts, still

show excess land supply over demand. The Plan recognizes that development needs to be monitored and guided to create a cohesive community, protect existing natural resources and limit the need for expanded and costly infrastructure investments.

Development Forms and Use Concepts

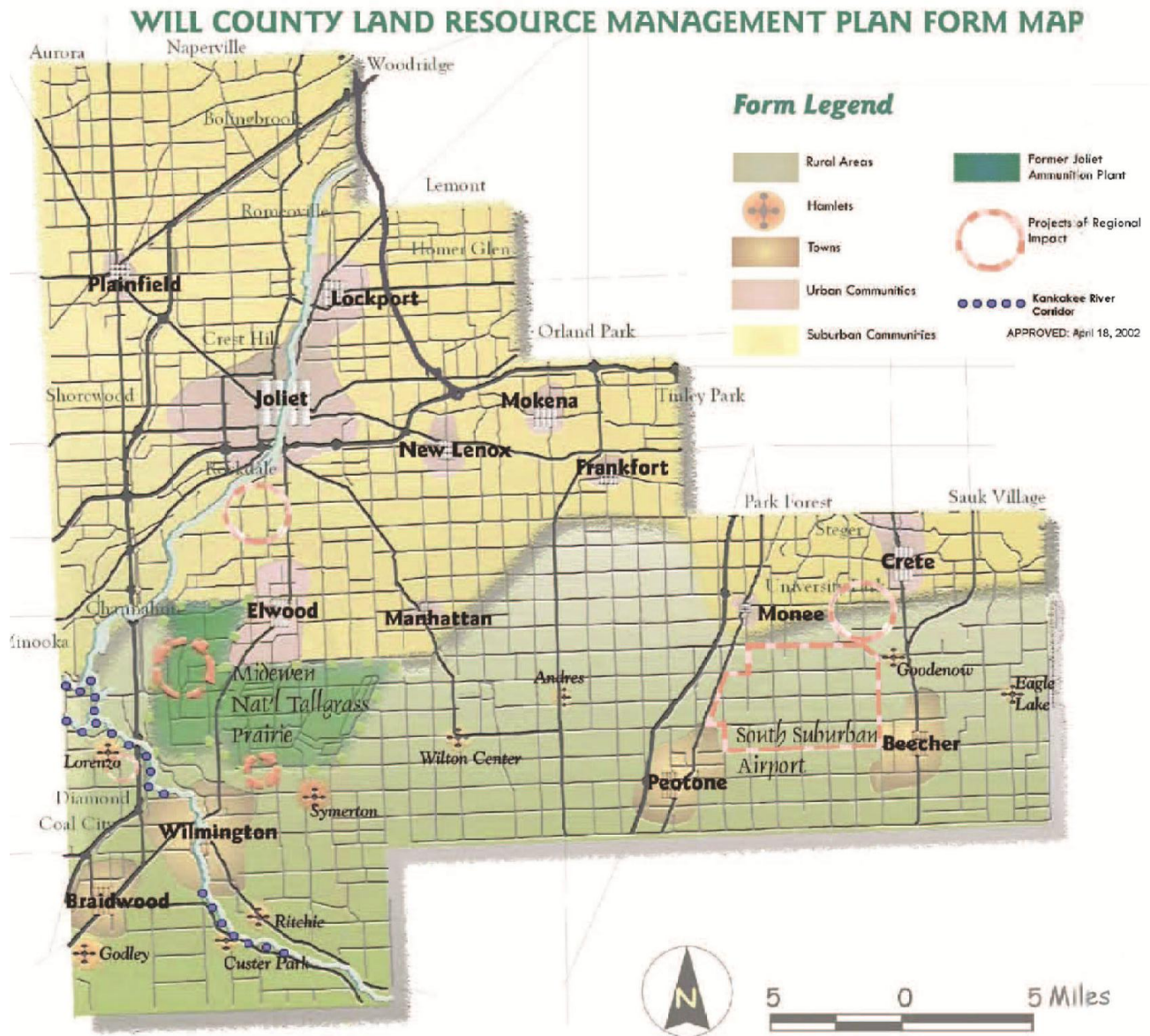
Despite recent land consumption and the preservation of some agricultural and open spaces, much of the County's total area is still considered developable land. In the interest of planning for new development in ways that complement and preserve existing features, the Plan establishes a framework for future growth and development that divides land into eight general categories of use, called Development Forms.

Development Forms include:

- **Rural Area:** characterized primarily by agricultural uses, homesteads associated with agricultural uses, and agricultural service businesses
- **Kankakee River Corridor:** a specific residential area along the Kankakee River that focuses on residential clusters within wooded areas, often on small lots with a river orientation
- **Hamlet:** small residential communities formed around the intersection of transportation facilities, often consisting of a small, grid-pattern neighborhood with a church or school, providing homes for nearby agricultural families
- **Town:** larger, independent communities with a mix of land uses typically consisting of a commercial and cultural core surrounded by residential areas and agricultural areas
- **Urban Community:** much like Towns, these areas are large, independent communities with a mix of land uses that border other urban communities and blend more naturally into the surrounding areas
- **Suburban Community:** primarily single-family subdivisions and strip commercial development with curving streets based on automobile-only use and no physical community center
- **Interstate Access Location:** strategic community areas directly surrounding an interstate highway interchange that can be the focus for high-quality employment areas
- **Former Joliet Army Ammunition Plant Properties (JOAAP):** a special land use area at the former ammunition plant that is appropriate for employment centers and industrial development
- **South Suburban Airport:** a special land use area at the proposed South Suburban Airport that encourages attractive development of airport-related services such as hotels, parking and cargo facilities as well as high-quality work force housing

The following map, which appears in the comprehensive plan, illustrates the planned distribution of these areas.

Figure 4-3
Future Land Use Map



Source: Will County Land Resource Management Plan

Within each of the development forms, the Plan specifies development use concepts. These describe types of projects that should be permitted within each development form. For instance, within a Town form, development use concepts include traditional residential, multi-family complex, and neighborhood commercial. Development Use Concepts give additional guidance on the design of each of these categories and are described below:

- **Agricultural:** land for crops, livestock homesteads and agri-business. Should be designed to minimize interference with nearby uses, respect environmentally sensitive areas, and should be reviewed for appropriate drainage.
- **Conservation Design:** residential subdivision that clusters homes closer together to preserve natural areas. Should be designed for more compact homes, interconnected natural areas, and a variety of housing types including detached, semi-detached and attached.
- **Conventional Residential Subdivision:** a typical residential subdivision with curvilinear streets and cul-de-sacs. Should be designed for more pedestrian paths and sidewalks, to emphasize connectivity between subdivisions, and to include more housing types beyond single-family dwellings.
- **Traditional Residential:** a residential neighborhood with smaller lots and homes in a grid pattern of streets. Should be designed for interconnected streets, pedestrian connections such as sidewalks that easily link people to amenities, and a mix of housing types including accessory housing options.
- **Multi-Family Complex:** concentrations of apartments, townhouses, condominiums and other multi-family uses exceeding seven units/acre density and 20 total units. Should be designed to include adequate open space, to be compatible with transit when possible, to have better design standards, and to be mixed in with largely developed areas.
- **Institutional:** public service buildings, private infrastructure buildings and non-profit buildings such as religious buildings and private schools. Should be designed to respect environmentally sensitive areas, integrate with transportation, and fit with surrounding buildings.
- **Employment Campus:** a wide range of office, business, light industrial, research and development uses, and related uses such as restaurants. Should be designed to incorporate mass transit, pedestrian amenities, and local trails.
- **Regional Commercial:** a large-scale destination with uses including commercial retail, offices, personal services, restaurants, shopping malls, strip centers and freestanding stores. Should be designed to abut interstates or arterial roads, and meet quality design standards.
- **Mid-Scale Commercial:** smaller commercial uses to serve the local area. Should be easily accessed by arterial roads, provide bicycle parking, and meet quality design standards.
- **Neighborhood Commercial:** small commercial centers to serve nearby residential areas. Should be designed to buffer residential

properties, are encouraged to be attached to residential uses, and should include connections to sidewalks or trails.

- **Freestanding Industry & Office:** single, dedicated use industries or offices not part of a business subdivision. Should be easily accessed by arterials and interstates, use native landscaping, and meet quality design standards.
- **Projects of Regional Impact:** projects that by virtue of their size, character or proximity to other jurisdictions would have a substantial regional impact. Should be designed to mitigate off-site impact, and be part of intergovernmental agreements or conversations.

Taken from the Land Use Plan, the spreadsheet below shows which Development Use Concepts are appropriate to use in each Development Form:

Figure 4-4
Development Use Concepts Allowed in Each Development Form

| | DEVELOPMENT FORMS | | | | | | | | |
|--|---------------------|--|-----------------------|---------------------|-----------------------------------|--------------------------------------|---|-------------------------------|---|
| | RURAL (pg. 7-10) | KANKAKEE RIVER CORRIDOR (pg. 11-12) | HAMLET (pg. 13-14) | TOWN (pg. 15-19) | URBAN COMMUNITY (pg. 20-24) | SUBURBAN COMMUNITY (pg. 25-26) | INTERSTATE ACCESS LOCATION (pg. 29-31) | FORMER JOAAP (pg. 32-3) | SOUTH SUBURBAN AIRPORT (pg. 34-37) |
| AGRICULTURAL (pg. 38-39) | ● | ● | ● | | | | | | ● |
| CONSERVATION DESIGN (pg. 40-44) | ● | ● | | ● | | ● | | | |
| CONVENTIONAL RESIDENTIAL SUBURBAN (pg. 45-47) | | ● | | ● | | ● | | | |
| TRADITIONAL RESIDENTIAL (pg. 48-51) | | ● | ● | ● | ● | ● | | | |
| MULTI-FAMILY COMPLEX (pg. 52-54) | | | | ● | ● | ● | ● | | ● |
| INSTITUTIONAL (pg. 55-57) | ● | ● | ● | ● | ● | ● | ● | ● | |
| EMPLOYMENT CAMPUS (pg. 58-60) | | | | ● | ● | ● | ● | ● | ● |
| REGIONAL COMMERCIAL (pg. 61-63) | | | | | ● | | ● | | |
| MID-SCALE COMMERCIAL (pg. 64) | | | | ● | ● | ● | | | ● |
| NEIGHBORHOOD COMMERCIAL (pg. 65-66) | ● | ● | ● | ● | ● | ● | | | ● |
| FREESTANDING INDUSTRY & OFFICE (pg. 67-68) | | | ● | ● | ● | ● | | ● | |
| PROJECTS OF REGIONAL IMPACT (pg. 69-70) | | | | ● | ● | ● | ● | ● | ● |

The Plan and Fair Housing

The Will County Land Resource Management Plan does not include a specific housing element; however, a variety of recommendations have an impact on fair and affordable housing options.

The primary way the Plan advances fair housing choice is through its encouragement of a variety of housing types within each development form. The Multi-Family Complex Development Use Concept is considered appropriate in five of the nine development forms. Even in traditionally isolated areas, such as suburban communities, there is a specific focus on a variety of residential types, including multi-family complexes. Accessory structures are allowed and encouraged in traditional residential neighborhoods. This mix of residential types allows affordable housing within areas of higher opportunity.

The Plan also advances fair housing choice by advocating for interconnectivity by non-automotive means. As the protected classes are generally more dependent on transit and means other than the automobile to get around, communities that are supportive of transit provide greater housing choice. Not only does the Plan specifically call for including transit in new developments, it also encourages communities to create better pedestrian and bicycle connections such as sidewalks and trails.

Finally, the Plan encourages the use of density bonuses to promote agricultural preservation, transit-oriented development, and conservation development; however, the Plan does not call for density bonuses specifically for affordable housing.

➤ Fair Housing Achievement

The 2002 Land Resource Management Plan, amended through August 2011, incorporates an array of policies that will have the effect of furthering fair housing aims.

These include a focus on mixed-use neighborhoods that provide a variety of housing types including multi-family complexes, advocate for walkable and transit-friendly communities to provide for those without vehicles, and include density bonuses for transit-oriented and conservation-style development, which can foster the creation of affordable housing.

While the Plan does encourage the type of mixed-use housing that promotes affordability, it does not include any specific reference to fair housing language or policy. There is no mention of affordable housing or fair housing as it relates to land use. There is no analysis of barriers to affordability—overtly, through regulatory obstacles, or socially, such as the perception that affordable rental housing is not necessary or desirable in some communities.

The Plan does mention affordable housing in relation to the proposed South Suburban Airport. Specifically, the plan says that prominent areas around the airport should be reserved for high-quality uses, and that while workforce housing is necessary and should be included, it should not use land better suited for high-end hotels or offices.



The Will County Land Resource Management Plan does not directly address fair or affordable housing barriers, goals or strategies.

Fair housing, or a more general housing policy, is not addressed in the County's land use plan. As a matter of public policy, the County's Plan should clearly state its advocacy for a variety of housing types available for diverse households at a variety of income levels.

F. Fairmont Neighborhood Plan

The *Fairmont Neighborhood Plan* is a localized plan to create specific recommendations for a neighborhood in need of revitalization. The Fairmont neighborhood is located north of downtown Joliet, surrounded by Joliet and Lockport, and located in unincorporated Will County. It is a racially concentrated area of poverty.

The Plan and Fair Housing

The Plan covers topics essential to fair housing, including land use, transportation and zoning issues. The Plan calls for a mix of housing types including senior-specific housing and multi-family housing that is attractive and affordable.

The focus of the Plan is an infusion of public funds to help transform and revitalize an affordable community without displacing current residents.

G. Zoning

In the State of Illinois, the Counties Code (55 ILC 51) Division 5-12, Zoning sets forth the power and provisions for counties to adopt zoning ordinances. The State Statute Division provides that: "Any zoning ordinance enacted by a city, village or incorporated town shall supersede, with respect to territory within the corporate limits of the jurisdiction, any county zoning plan otherwise applicable."

Each of the municipalities participating in the County CDBG entitlement program has adopted its own zoning code. As a result, Will County only administers zoning for unincorporated areas under the jurisdiction of the Will County zoning ordinance.

Seven municipal zoning ordinances and the County ordinance were reviewed for this analysis to identify potentially discriminatory land use provisions. The ordinances were intended to be a representative sample of the variety existing across the County, in terms of community type and characteristics. The communities selected also represent a geographic cross-section of the County, as they are scattered across its entire expanse. The ordinances reviewed for the AI include the following:

- Plainfield
- Lockport
- New Lenox
- Crete
- Romeoville

- Shorewood
- Beecher

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

1. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

The ordinances reviewed for this analysis ranged in publication date from 1981 to 2012, though all older codes have been amended through recent years.

2. Residential Zoning Districts and Permitted Dwelling Types

Number of Zoning Districts

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the jurisdiction's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

Ordinances for the municipalities reviewed all provided an extensive variety of residential zoning categories, distinguishing between large-lot agricultural single-family areas, more standard single-family detached zones, dense zones allowing single-family and two-family homes, and urban multi-family zones where apartments are permitted by right. The Village of Shorewood, for instance, has twelve residential districts including one agricultural district, while the Village of Beecher, the smallest of the communities reviewed, had five residential districts.

Permitting Multi-Family Units

All of the municipalities reviewed are fast-growing communities, much like Will County as a whole. Population increases range from 12.4% to 187.6% between 2000 and 2010. As such, all are accommodating new growth, but some of the communities are significantly larger and older than others. The development of multi-family housing is generally accommodated by most communities; however, newer communities such as New Lenox and Shorewood have more districts—three each—allowing multi-family units by right than some older communities. Two other codes—Romeoville's and Will County's—do not permit multi-family units by right in any district. Romeoville has nine residential districts with only one permitting multi-family housing as a special use, despite the availability of water and sewer services there.

Will County's code outlines nine residential districts, from large-lot agricultural single-family areas to townhouses; however, only one zoning district allows multi-family complexes as a special use due to the County's lack of services. In Will County, zoning is often used as a tool to preserve rural space where public water and sewer service are not available and not likely to be provided without municipal annexation. In these areas particularly, multi-family housing is unlikely due to this lack of public services. Across the majority of southern Will County, single-family homes are the only permitted residential use.

Most of the communities provided some space, and generally multiple areas, for multi-family dwellings. Will County and Romeoville are the exception, having no multi-family permitted use district. Similarly, the Village of Shorewood has only one small parcel zoned as its densest, R-5 category, and no areas zoned as its second densest, R-4 category. It does, however, have large areas zoned as R-3-A which allows multi-family development.



One zoning ordinance—Romeoville—provides no districts in which multi-family units are permitted uses.

Without permitting multi-family uses by right in any district, communities restrict the construction of more affordable housing by forcing multi-family complexes to undergo extensive permitting and review processes. While Will County's zoning ordinance also does not allow multi-family complexes as a permitted use in any zoning district, the lack of sewer and water services necessitates this.

3. Permitted Residential Lot Sizes

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

The ordinances reviewed for the AI provide a wide range of residential districts ranging from low-density areas with extremely low minimum lot sizes to agricultural districts with lots of at least 215,000 square feet. Larger minimum lot sizes tend to discourage the development of many affordable housing options, but in most cases, even rural communities provide some higher-density categories with lower minimum lot sizes and allowances for a variety of dwelling types (two-family, multi-family). The County's zoning code, which tends to focus on rural areas, allows single-family detached homes on lots as small as 10,000 square feet.

4. **Alternative Design**

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower-cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

Planned Unit Developments

Most of the ordinances reviewed contained a provision for planned unit or cluster development through overlay districts. These districts exist to promote a more efficient use of space and preservation of open space through providing flexibility in design standards and density. In the absence of affordable housing set-asides within these arrangements, however, the districts will likely include primarily low-density, higher-priced homes. No zoning codes specifically required affordable housing as part of PUDs, and no zoning code specifically gave density bonuses for the inclusion of affordable housing.

As long as the market drives the price of units created, developers have little incentive to create moderately priced units. One of the most useful and successful tools for creating affordable housing opportunities is inclusionary zoning. Simply, inclusionary zoning involves a specified number or percentage of new housing units in a development that is set-aside for moderately priced homes. Inclusionary zoning is a “carrot and stick” approach to expanding affordable housing.

Accessory Dwelling Units

An additional design option is the inclusion of accessory dwelling units. These units are detached, small homes, often intended for elderly residents to maintain independence while living in close proximity to family. It is also a more affordable option for seniors. Will County specifically outlines an “Elder Cottage Housing” unit that allows accessory structures in most residential districts for family members age 62 and older.

➤ Fair Housing Achievement

Will County's recently approved zoning ordinance includes a provision for Elder Cottages, which are an affordable way for those 62 years or older to maintain housing and independence.

The Elder Cottage Housing units allow accessory structures in most residential districts for family members age 62 and older. These units allow seniors to maintain independence while living in affordable units in proximity to family.

Transit-Oriented Development

Transit-oriented developments are mixed-use, walkable complexes located near transit stations. While not inherently affordable, these developments do have the potential for providing affordable housing that includes easy access to frequent transit service.

No zoning code in Will County has an express transit-oriented development district; however, many communities with transit stations or routes include higher-density permitted uses along those routes. Additionally, two communities—New Lenox and Plainfield—have created plans for transit-oriented developments around existing and proposed Metra rail stations.

5. Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

The ordinances reviewed for the AI vary from an extremely inclusive definition to an extremely restrictive definition. New Lenox has the most inclusive definition, allowing eight or fewer persons, related or not, to be defined as a family. All other zoning codes allow as many people related by blood, marriage and in most cases adoption to live together as desired.

For those unrelated by blood, marriage, and/or adoption, Lockport and Shorewood allow six or fewer persons, Crete allows five or fewer, Plainfield allows four or fewer, and Beecher and Will County allow three or fewer unrelated individuals to live together. Romeoville, as the most restrictive community, has no provision for unrelated persons to live together. While this cap can restrict housing choice for non-traditional families, the regulations make exceptions or separate provisions in each case for group homes for persons with disabilities.

6. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any

other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes and are inconsistent with the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, municipalities may not impose distancing requirements on group homes for persons with disabilities.

Group Home Regulations in Will County

Will County's zoning code does not place any locational restrictions on small group homes of up to six residents, allowing them to exist as single-family residences in districts where single-family homes are permitted by right.

Except for Will County, Crete and Beecher, all other communities place minimum distances between group care homes ranging from 500 feet in New Lenox to 2,000 feet in Romeoville.

➤ Fair Housing Achievement

Will County's recently approved zoning ordinance is inclusive for group homes, allowing them to be built by right in all residential districts without locational restrictions or additional regulations.

Half of the zoning codes reviewed allow certain group homes as permitted uses in some or all of their residential zoning categories. Conversely, Beecher, Crete, Plainfield and Romeoville do not allow group homes of any size as a permitted use in any residential district. Beecher does not address group homes as a special use in any district, effectively prohibiting group homes in the village.

Four communities place additional restrictions on group homes for persons with disabilities that are inconsistent with fair housing standards:

- New Lenox requires large residential care homes to submit a statement as to the nature of the home, the number and type of personnel who will be employed, and the number and nature of the residents who will live in the home.
- Shorewood's zoning code states that a village administrator may revoke a group home's certificate of occupancy if its license is revoked or not issued within a reasonable period of time.
- Romeoville's code states group care homes must submit agency qualifications, a description of the type of group home, meet off-street parking requirements and may not be visibly

different than other homes in the area (exempting special accommodations such as ramps).

- Crete requires health and medical institutions, such as sheltered care homes, to have a 20,000 square feet minimum lot size in districts requiring only 7,200 square feet lot sizes for single family homes.



Many of the ordinances reviewed place restrictions and additional regulations on group homes beyond those placed on single-family homes.

Half the zoning codes do not provide group homes as a permitted use in any district, five codes require minimum distances between group homes, and four codes place additional regulations on the homes such as larger minimum lot sizes. To be consistent with the Fair Housing Act, group homes for persons with disabilities should be regulated as single family dwelling units.

H. Public Housing

Three public housing authorities are located within Will County: Housing Authority of Joliet, Aurora Housing Authority and Housing Authority of Park Forest. The Housing Authority of Joliet is the only one contained entirely within Will County and manages both traditional public housing and the Section 8 Housing Choice Voucher program. Aurora Housing Authority is only partially located within Will County, its area of focus mainly in Kane County. Similarly, the Housing Authority of Park Forest is focused mainly within Cook County.

Because Aurora Housing Authority and Housing Authority of Park Forest are mainly located within surrounding counties, this document will focus on the Housing Authority of Joliet.

1. Housing Authority of Joliet

While the Housing Authority of Joliet was invited to participate in the Urban County's analysis of impediments, requests for interviews were not granted. The following description of the Housing Authority's inventory, policies and practices was included in the City of Joliet's AI completed in 2010.

a. Inventory

According to the Housing Authority's 2010 5-Year Annual Plan, HAJ owns and manages a total of 989 units of public housing.

Of these, 876 units were occupied as of November 2010. The remaining 113 units are vacant. The vacant units are located at Fairview Homes (58 units), Des Plaines Gardens (15), the John O. Holmes Complex (8), the John F. Kennedy building (8), Heritage Place (4), the John C. Murphy building (7), and the Adlai Stevenson building (13). With the exception of the 58 vacant units at Fairview Homes, the remaining 55 units are being turned around for occupancy to households on the waiting list for public housing.

The vacant units at Fairview Homes were taken offline while HAJ had a pending application for demolition funding before HUD. In September

2010, HAJ withdrew its application, and developed a strategy to rehabilitate the vacant units and make them available for leasing. As of September 30, 2011, HAJ had achieved 99% occupancy rate.

Following the withdrawal of the Fairview Homes demolition plan, HUD assessed the site and agreed that demolition of the property was appropriate. As of October, 2012, HUD said the project had deteriorated to the point that it would be more costly to fix it than to replace it.

Within the HAJ inventory, Des Plaines Gardens and Fairview Homes are the only designated family units.

In 2007, the HAJ demolished Poole Gardens, a 106-unit family site. It was redeveloped with tax credits as a mixed-income single family and duplex community.

The HAJ public housing stock is detailed in Figure 4-5 below.

Figure 4-5
HAJ Public Housing Developments by Unit Size, 2010

| Development | Breakdown of Dwelling Units | | | | | Total Units |
|--------------------------|-----------------------------|------------|------------|------------|-------------|-------------|
| | 0 Bedrooms | 1 Bedroom | 2 Bedrooms | 3 Bedrooms | 4+ Bedrooms | |
| Des Plaines Garden Homes | - | 48 | 46 | 36 | 32 | 162 |
| Fairview Homes | - | - | 40 | 90 | 38 | 168 |
| John O. Holmes Complex | 19 | 102 | 4 | - | - | 45 |
| Heritage Place | - | 45 | - | - | - | 45 |
| John C. Murphy Building | 42 | 92 | 5 | - | - | 139 |
| John F. Kennedy Terrace | - | 165 | 8 | - | - | 173 |
| Adlai Stevenson Gardens | - | 176 | 1 | - | - | 177 |
| Total Units | 61 | 628 | 104 | 126 | 70 | 989 |

Source: Housing Authority of Joliet

Of the 876 households residing in HAJ's public housing communities in 2010, 22% were families with children and 35.5% were individuals/families with disabilities. The majority of households (70.5%) were Black; Whites represented 28.7% of tenant households. According to HAJ, Des Plaines Gardens and Fairview Homes include concentrations of Black female-headed households. Figure 4-6 details the demographics of Joliet's public housing residents.

Figure 4-6
Characteristics of Current Public Housing Residents, 2010

| Current Voucher Holders | | |
|---|------------|---------------|
| Total households | 876 | 100.0% |
| Income level | | |
| Extremely low income (30% or less of AMI) | 704 | 80.4% |
| Very low income (30.1% to 50% of AMI) | 139 | 15.9% |
| Low income (50.1% to 80% of AMI) | 27 | 3.1% |
| Household type* | | |
| Families with children | 193 | 22.0% |
| Elderly | 300 | 34.2% |
| Member with a disability | 311 | 35.5% |
| Race and ethnicity | | |
| Black | 618 | 70.5% |
| White | 251 | 28.7% |
| Asian | 4 | 0.5% |
| Other race | 3 | 0.3% |
| Characteristics by bedroom size | | |
| 0 Bedroom | 53 | 6.1% |
| 1 Bedroom | 595 | 67.9% |
| 2 Bedroom | 86 | 9.8% |
| 3 Bedroom | 89 | 10.2% |
| 4 Bedroom | 44 | 5.0% |
| 5+ Bedroom | 9 | 1.0% |

* Categories are not mutually exclusive.

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Housing Authority of Joliet

b. Section 504 Needs Assessment

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a PHA's administrative offices, applicant offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

The regulations at 24 CFR 8.26 and HUD PIH Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes is to expand housing choice for people with disabilities.

Over two-thirds of HAJ's public housing communities are designated for elderly or near-elderly households and people with disabilities. HAJ completed a Section 504 Needs Assessment in 1992, at which point there were no accessible units for persons with mobility or sensory



impairments.⁷ Since then, HAJ has created 106 accessible public housing units.

2011 Needs Assessment and Transition Plan

The Housing Authority completed a new Section 504 Assessment in May, 2011. The study used UFAS standards in combination with the Americans with Disabilities Act, the Illinois Accessibility Code and ANSI A117.1-2003. In cases where regulations differed, the consultant team used the more restrictive regulation.

The study found that none of the public housing communities met accessibility standards for the number of units needed. To rehabilitate the public spaces, administration offices and private accommodations to full compliance with federal regulations is estimated to cost \$1.8 million.

c. Redevelopment Plans

To replace the 106 family units lost through the demolition of Poole Gardens, HAJ is developing Liberty Meadows estates, a mixed-income residential community. The master plan for the project includes the construction of approximately 186 units of affordable housing. The plan consists of 96 single family units and 90 duplex units. Twenty-two of the 186 units are expected to be market-rate units. The remaining 164 units will be affordable units to replace those demolished. According to the Housing Authority's website, Liberty Meadow Estates, Phase I, which includes 74 units, was completed in March of 2009. Liberty Meadows Estates, Phase II is currently under construction and will include an additional 42 units. The third and final phase of Liberty Meadows will be completed at some time in the future, following the awarding of Low-Income Housing Tax Credits and a complete proposal submitted to HUD.

In addition, the Housing Authority is seeking to demolish Fairview Homes and Des Plaines Gardens. Both developments required substantial costs to upgrade accessibility measures for full compliance, as demonstrated in the Section 504 Needs Assessment. Originally sought for redevelopment in 2010, the Fairview Homes demolition request was withdrawn by HAJ. Recently, HUD notified HAJ that demolition and redevelopment should occur. Both projects, if demolished, would be redeveloped as mixed-income properties.

d. Public Housing Admission and Continued Occupancy Plan (ACOP)

Non-Discrimination Policy

HAJ's non-discrimination policy can be found in Chapter 1(d) of the ACOP. Compliance is pledged with all federal civil rights laws which protect public housing applicants and residents with equal treatment in all HAJ programs and services. The ACOP states that HAJ does not discriminate on the basis of race, color, sex, religion, familial status, disability, national origin, marital status, or sexual orientation.

Reasonable Accommodation Policy

Chapter 1(e) sets forth HAJ's reasonable accommodation policy. Participants with a disability must request a special accommodation in order to be treated differently than other non-disabled persons. In order

⁷ Housing Authority of Joliet Section 504 Transition Plan.

to be considered as a person with a disability, the applicant or resident must certify that they meet the ADA definition of disability. HAJ will then utilize reliable, knowledgeable and professional representatives to verify the disability.

When requested and where the need for a reasonable accommodation has been established, HAJ will conduct home visits to residents to conduct annual and interim re-certifications. HAJ also will refer families who have persons with disabilities to agencies in the community that offer services to persons with disabilities.

Language Access Plan

Chapter 1(f) of the ACOP outlines HAJ's policy on the translation of documents. HAJ employs bilingual staff to assist non-English speaking families in Spanish and will consider providing translation of documents into Spanish upon request by a non-English speaking applicant or tenant. Further details of serving persons with limited English proficiency (LEP) are outlined in the Authority's Language Access Plan (LAP).

Qualifications for Applying

To be eligible for public housing, an applicant must qualify as a family. Chapter 2(b) of the ACOP defines "family" as a single person or a group of persons, or elderly, disabled, and displaced families as defined by HUD. A "group of persons" is defined by HAJ as "two or more persons who intend to share residency, whose income and resources are available to meet the family's needs, and will live together in PHA housing." Chapter 2(b) prohibits discrimination based on groups of persons not related by blood, marriage, or operation of law.

A family is eligible for assistance if at least one member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are referred to as mixed families. Such families will be given notice that their income-based assistance will be pro-rated and that they may request a hearing if they contest this determination.

Waiting List Preferences

Chapter 4(a) establishes the waiting list preference for applicants. The Authority uses the following admission preferences:

- Date and time of pre-application
- Involuntary displacement
- Residency for families who live, work, or have been hired to work in Joliet, and
- Working preference, for families where the head, spouse, or sole member is employed. This preference is awarded also to elderly applicants and to applicants whose head or spouse meets the HUD/Social Security definition of disability.

HAJ also lists its preferences for Mixed Population developments, which gives priority to elderly families and individuals/families with disabilities.

It is the policy of HAJ not to merge the waiting lists for the Public Housing Program and the Housing Choice Voucher Program, as stated in Chapter 4(n). However, if the Housing Choice Voucher Program waiting list is open when an applicant applies for the Public Housing



Program, HAJ must offer to place the family on both lists. Likewise, if the Public Housing Program waiting list is open at the time an applicant applies for the Housing Choice Voucher Program, HAJ must offer to place the family on both lists.

Income Targeting

Chapter 4(i) of the ACOP outlines HAJ's income targeting policy. HAJ will monitor its admissions to ensure that at least 40% of applicants admitted to public housing have incomes of less than 30% of the median household income. Chapter 4(l) describes HAJ's de-concentration policy. As of March 2010, neither of HAJ's general occupancy family housing developments was subject to the de-concentration policy because of the income range within the communities.

Integration Policy

Chapter 4(m) of the ACOP specifies HAJ's integration policy. HAJ states that it shall affirmatively further fair housing to reduce racial and national origin. To accomplish this, HAJ simply says it shall not assign persons to a particular section of a community based on protected class status. HAJ does not explain how it would seek to de-segregate communities however.

Pet Policy

Chapter 10 defines HAJ's pet policies. A person with a disability may be excluded from the pet policy if the animal has been trained to assist with a specified disability and the animal actually assists the person with the specified disability.

Grievance Policy

Chapter 14 establishes a procedure for residents to present grievances to HAJ. Any filed grievance shall be presented orally or in writing to HAJ's office or to the housing management office. Written grievances must be signed by the complainant. A reasonable time is considered to be within ten calendar days after the day of the action or failure to act, which is the basis for the grievance. Policy allows for informal hearings to discuss and to resolve the grievance without the necessity of a formal hearing. After exhausting the informal hearing procedures, a complainant shall be entitled to a formal hearing before the Hearing Officer. The Hearing Officer shall give HAJ and the complainant a written decision, including the reasons for the decision, within ten calendar days following the formal hearing. The decision of the Hearing Officer shall be binding on HAJ, which shall take all actions necessary to carry out the decision, unless the complainant requests Board action within ten calendar days prior to the next Board meeting.

e. Section 8 Housing Choice Voucher Administrative Plan

In addition to public housing, HAJ is the administrator of the Section 8 Housing Choice Voucher program for all of Will County. As of March, 2012, there were 1,371 Section 8 voucher holders.

Using a Section 8 Voucher

When a new applicant is provided with a voucher, they are given 60 days to secure private rental housing. HAJ reported that, generally, only 2% of applicants return their vouchers to the Authority due to their

inability to secure private rental housing during the 60-day period. Under certain circumstances, HAJ will grant extensions to applicants. These circumstances may include a head of household who is disabled, a death in the family, and/or illness of a family member that prevents the family from searching for a unit. If given an extension of time, all applicants have been able to secure private rental housing, according to HAJ.

HAJ advises voucher holders of their mobility options and cooperates with agencies throughout the metropolitan area. On average, HAJ assists 119 participants from other jurisdictions who have selected to “port in” to Joliet or Will County. Of these, 93.2% are Black households and 20% are large families. Another 55 voucher holders have selected to “port out” of Joliet and Will County. Of these, 92.7% are Black households and 14.5% are large families.

Location of HAJ Section 8 Voucher Holders

Among the 1,371 Section 8 voucher holders under the jurisdiction of HAJ, 53% reside in the City of Joliet and 44% reside outside of Joliet but within Will County. (The remaining 3% reside outside of Will County.) Since 1991, HAJ voucher holders have expanded their geographic locations significantly. Voucher holders outside of Joliet in Will County have expanded from 3% in 1991 to 42% in 2010, and 44% in 2012.

HAJ reported that it encourages voucher holders to seek housing in neighborhoods that are not traditional residential areas for the voucher holders. Family Self-Sufficiency staff persons are utilized to assist voucher holders with finding private rental units across the City and in Will County. New voucher holders review a video, the Section 8 handbook and a list of available units based on bedroom size. HAJ will further assist with a computerized search.

Finding Housing with a Section 8 Voucher

In order for Section 8 voucher holders to find decent, affordable private rental housing units, there must be an adequate supply of such units in throughout Will County. HAJ reported that it maintains a list of participating landlords who offer their units for inspection and rental through the Section 8 program. The Authority maintains a list of landlords with available units and landlords contact HAJ on a daily basis to place units in the program. In order to accept a unit, HAJ conducts an inspection of the rental unit to determine if it meets Section 8 Housing Quality Standards (HQS). HAJ reported that the majority of units comply with HQS with only minor repairs needed at the initial inspection.

HAJ reported that participating landlords recognize the income stability of the Section 8 program. The landlords realize that if a Section 8 voucher holder loses their job and experiences a decrease in their income, HAJ will lower the tenant’s monthly rent obligation based on their lower income, and increase the landlord’s portion of the rent payment. The tenant can remain in their affordable unit and the landlord continues to receive a stable rental income.

HAJ reviews its payment standard annually. Currently, the Authority pays 100% of the HUD fair market rent (FMR) payment standard.



HAJ is very aggressive in its efforts to expand housing choice for people with disabilities. For example, HAJ maintains a list of accessible private rental units that accept Section 8 vouchers and will refer disabled applicants to these units. The Authority also works with agencies such as the Will-Grundy Center for Independent Living, Cornerstone Services, and Aunt Martha's Youth Service Center to assist people with disabilities in finding affordable and accessible housing units.

HAJ has 45 vouchers designated for non-elderly disabled individuals and 200 vouchers designated through the Mainstream Program for people with disabilities. In addition, HAJ received Bridge Subsidy funding from the Illinois Department of Mental Health to assist 30 individuals with disabilities.

Anti-Discrimination Policy

Chapter 1(g) of the Section 8 Admin Plan states HAJ's anti-discrimination policy. According to the Plan, HAJ shall not deny any family or individual the equal opportunity to apply for or receive assistance on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability or sexual orientation. As a matter of policy, civil rights and fair housing information is provided to clients during the family briefing session and as part of the voucher holder's briefing packet.

HAJ staff is required to attend fair housing training, including training on the provision of reasonable accommodation to persons with disabilities.

Reasonable Accommodation Policy

HAJ's policy relative to reasonable accommodation is outlined in Chapter 1(h). Participants with a disability must request a special accommodation in order to be treated differently than other (non-disabled) persons. In order to be considered as a person with a disability, the applicant or resident must certify that they meet the ADA definition of disability. HAJ will then utilize a professional third party to verify the disability.

As stated in Chapter 1(h), all persons who wish to apply for any of HAJ's programs must register via telephone as indicated in its public notice. Applications will then be mailed to the address given during the registration process. Applications will be made available in an accessible format upon request from a person with a disability.

Chapter 1(i) of the Admin Plan outlines HAJ's policy on the translation of documents. This policy mirrors the ACOP policy.

Definition of a Family

To be eligible to receive a Section 8 Housing Choice Voucher, an applicant must qualify as a family. HAJ employs the same definition of family as in its ACOP. Similarly, mixed families are guided by a policy identical to its ACOP policy.

Waiting List

The maintenance of the Section 8 waiting list is outlined in Chapter 4. HAJ uses the following local preference system:

- Involuntary displacement

- Government action or natural disaster, and
- Owner actions such as sale of the property.

Encouraging Housing Outside RCAP/ECAPs

Chapter 8(c) describes HAJ's policy about encouraging participation outside of areas of LMI or minority concentration. The policy states that families are encouraged to search for housing outside racially/ethnically concentrated areas of poverty during the family briefings and that HAJ will provide assistance to families who wish to do so. HAJ provides maps that show various areas and information about facilities and services in areas such as schools, transportation, and supportive and social services. Additional assistance includes providing families with information on housing available outside RCAP/ECAPs, direct contact with landlords outside these areas, counseling services, providing information about services outside RCAP/ECAPs, meeting with neighborhood groups to promote understanding, and meetings with landlords and social service agencies.

Complaints and Appeals

Chapter 19 of the Admin Plan establishes a process for applicants to present complaints and appeal decisions of the Authority. HAJ must provide applicants with the opportunity for an informal review of decisions denying:

- Listing on HAJ's waiting list
- Issuance of a voucher
- Participation in the program, and
- Assistance under portability procedures.

A request for an informal review must be received in writing by the close of the business day, no later than 10 days from the date of HAJ's notification of denial of assistance.

f. Language Access Plan

HAJ has adopted a Language Access Plan (LAP) to provide persons with limited English proficiency (LEP) with meaningful access to agency operated housing assistance and social service programs and activities. Persons with LEP may be entitled to free language assistance with respect to a HAJ program, benefit, or right. Language assistance includes translation services of written messages and interpretation services of oral or spoken messages.

HAJ will periodically assess client need for language assistance based on the number of requests for interpreters and/or translation, as well as the literacy skills of clients.

According to the LAP, the Authority will translate vital documents if the language group meets one of the following four conditions:

- An eligible LEP population within the market area exceeds 1,000 persons, or
- The current beneficiaries (participants) of an assisted housing program exceeds 1,000 persons, or
- If the eligible population or beneficiaries (participants) of an assisted housing program exceeds 5%, or

- There are more than 50 beneficiaries (participants) of an assisted housing program.

One-of-a-kind documents, such as letters that deny admission to a housing assistance program or a notice of termination of tenancy, will not be translated. However, on such documents, HAJ will attach a notice that advises persons with LEP of the availability of translation interpretation services that are provided at no extra charge.

When necessary to provide meaningful access for LEP clients, HAJ will provide qualified interpreters, including HAJ bilingual staff and contract vendors. HAJ will provide formal interpreters for activities such as an applicant hearing upholding the denial of admission to a housing assistance program, an informal or formal hearing for termination from participating in a housing assistance program, and a non-disclosure hearing. HAJ will also allow for the use of informal interpreters, such as family members, friends, or service representatives of a person with LEP, upon the request of the client. HAJ will determine if the use of an informal interpreter is appropriate, given potential issues of confidentiality, competency or conflicts of interest in the situation.

g. Waiting List

Public Housing Waiting List

HAJ maintains a waiting list of 622 families for public housing. Of these 75.9% are Black households and 18.3% are White households. Families with children represent 55.5% of the waiting list while families with disabilities account for 6.6%. Those needing three or more bedrooms represent 35.7% of applicant households.

The characteristics of the public housing waiting list are detailed in Figure 4-7.

Figure 4-7
Housing Authority of Joliet, Public Housing Wait List, 2012

| | Public Housing Waiting List Applicants | |
|---|---|---------------|
| Total households | 622 | 100.0% |
| Income level | | |
| Extremely low income (30% or less of AMI) | 453 | 72.8% |
| Very low income (30.1% to 50% of AMI) | 2 | 0.3% |
| Low income (50.1% to 80% of AMI) | 2 | 0.3% |
| Household type* | | |
| Families with children | 345 | 55.5% |
| Elderly | 61 | 9.8% |
| Families with Disabilities | 41 | 6.6% |
| Race and ethnicity | | |
| Black | 472 | 75.9% |
| White | 114 | 18.3% |
| Asian | 6 | 1.0% |
| Native American | 1 | 0.2% |
| Hispanic ** | 46 | 7.4% |
| Characteristics by bedroom size | | |
| 1 Bedroom | 189 | 30.4% |
| 2 Bedrooms | 211 | 33.9% |
| 3 Bedrooms | 149 | 24.0% |
| 4 Bedrooms | 51 | 8.2% |
| 5 Bedrooms | 22 | 3.5% |

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race.

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Housing Authority of Joliet, 5-Year Action Plan

HAJ utilizes a jurisdiction-wide (i.e., County-wide) waiting list for its public housing communities. Applicants are able to reject an offer for a rental unit up to three times before being removed from the waiting list. Additionally, HAJ policy outlines “good cause” reasons for applicants who would be willing to accept a unit but are unable to occupy it immediately. These reasons include, among others:

- An elderly or disabled applicant makes the decision not to occupy or accept occupancy in designated housing
- Inaccessibility to employment or childcare
- Presence of lead paint
- The unit is inappropriate for the applicant’s disabilities

Section 8 Voucher Waiting List

HAJ also maintains a waiting list of 1,374 families for Section 8 tenant-based assistance. The waiting list was open from March 1, 2010 to March 4, 2010, during which time a total of 2,354 families registered. Of those on the waiting list, 87.4% are Black, 10.9% are White, and 4.3%

are Hispanic. Families with children comprise 77% of the waiting list total.

The characteristics of the Section 8 Voucher waiting list are detailed in the figure below.

Figure 4-8

Housing Authority of Joliet, Section 8 Voucher Wait List, 2012

| Section 8 Waiting List Applicants | | |
|---|--------------|---------------|
| Total households | 1,374 | 100.0% |
| Income level | | |
| Extremely low income (30% or less of AMI) | 1,004 | 73.1% |
| Very low income (30.1% to 50% of AMI) | 318 | 23.1% |
| Low income (50.1% to 80% of AMI) | 49 | 3.6% |
| Household type* | | |
| Families with children | 1,058 | 77.0% |
| Elderly | 51 | 3.7% |
| Families with Disabilities | 250 | 18.2% |
| Race and ethnicity | | |
| Black | 1,201 | 87.4% |
| White | 150 | 10.9% |
| Asian | 1 | 0.1% |
| Native American | 3 | 0.2% |
| Hispanic ** | 59 | 4.3% |
| Multi-Racial | 19 | 1.4% |

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race.

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Housing Authority of Joliet, 5-Year Action Plan

2. Aurora Housing Authority

While the Aurora Housing Authority (AHA) operates largely outside of the boundaries of Will County, there is a small section of the City located in Will County. A brief overview of the Section 8 and public housing programs, provided below, was obtained from AHA's Five-Year Agency Plan.

a. Waiting List

Public Housing Waiting List

AHA maintains a waiting list of 1,214 families for public housing. Of these 66.5% are Black households, 11.7% are Hispanic households and 19.0% are White households. Families with disabilities account for 5.1% of those on the waiting list.

The characteristics of public housing applicants are detailed in Figure 4-9.

Figure 4-9

Aurora Housing Authority, Public Housing Wait List, 2012

| | Public Housing Waiting List Applicants | |
|---|---|---------------|
| Total households | 1,214 | 100.0% |
| Income level | | |
| Extremely low income (30% or less of AMI) | 923 | 76.0% |
| Very low income (30.1% to 50% of AMI) | 131 | 10.8% |
| Low income (50.1% to 80% of AMI) | 18 | 1.5% |
| Household type* | | |
| Elderly | 17 | 1.4% |
| Families with Disabilities | 62 | 5.1% |
| Race and ethnicity | | |
| Black | 807 | 66.5% |
| White | 231 | 19.0% |
| Asian | 18 | 1.5% |
| American Indian/Alaska Native | 8 | 0.7% |
| Race Not Assigned | 8 | 0.7% |
| Hispanic ** | 142 | 11.7% |

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race.

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Aurora Housing Authority, 2013 Draft Annual Plan

Section 8 Voucher Waiting List

AHA also maintains a waiting list of 269 families for Section 8 tenant-based assistance. Of those on the waiting list, 47.2% are Black, 7.4% are White, and 3.7% are Hispanic. Families with disabilities comprise 3.3% of the waiting list total.

The characteristics of the Section 8 Voucher waiting list are detailed in the figure below.

Figure 4-10

Aurora Housing Authority, Section 8 Voucher Wait List, 2012

| Section 8 Waiting List Applicants | | |
|---|------------|---------------|
| Total households | 269 | 100.0% |
| Income level | | |
| Extremely low income (30% or less of AMI) | 235 | 87.4% |
| Very low income (30.1% to 50% of AMI) | 21 | 7.8% |
| Low income (50.1% to 80% of AMI) | 3 | 1.1% |
| Household type* | | |
| Elderly | 1 | 0.4% |
| Families with Disabilities | 9 | 3.3% |
| Race and ethnicity | | |
| Black | 127 | 47.2% |
| White | 20 | 7.4% |
| Asian | 0 | 0.0% |
| American Indian/Alaska Native | 1 | 0.4% |
| Race Not Assigned | 111 | 41.3% |
| Hispanic ** | 10 | 3.7% |

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race.

Note: Totals do not match due to inavailability of some data for some

Source: Aurora Housing Authority, 2013 Draft Annual Plan



Minorities, especially Black households, are disproportionately represented on the waiting lists for public housing and Section 8 vouchers for both Housing Authority of Joliet and Aurora Housing Authority.

This trend reveals a lack of affordable housing in the private market and its greater impact on LMI minority households.

3. Park Forest Housing Authority

Similar to Aurora Housing Authority, Park Forest Housing Authority (PFHA) operates largely outside of the boundaries of Will County. Additionally, the housing authority is particularly small and only administers the Section 8 Voucher Program.

The location of all voucher holders in Will County by census tract is shown on Map 4-4 on the following page. Additional maps on subsequent pages illustrate demographic information of those voucher holders.



Section 8 voucher holders are clustered in racially/ethnically concentrated areas of poverty and in the northern half of the County.

Affordable housing choice is limited primarily to racially/ethnically concentrated areas of poverty in Will County, and there are communities in northern Will County that provide good access to transportation and jobs that have few or no voucher holders.

4. Privately Assisted Housing and HUD Subsidized Housing

Types of Privately Assisted Housing

In addition to the private housing market, there is a substantial privately owned assisted housing inventory in Will County. Privately assisted housing is privately owned but affordable due to the funding source used to develop the housing units. This type of subsidized housing differs from public housing that is owned by a government entity. Eligible resident households typically include those who are elderly (either 55 or 62 years of age or older), low and moderate income (80% of median income or less), or persons with disabilities. Financing for these affordable units typically comes from state and federal sources such as the Low Income Housing Tax Credit Program (LIHTC); the U.S. Department of Agriculture's Section 515 Program; HUD's Section 202 (elderly), Section 8 New Construction/Subsidized Rehab, Section 811 (disabled), Section 236 and Section 221(d) (family) Programs.

Privately Assisted Housing in Will County

The location of all public housing and privately assisted housing in Will County is depicted on the map on the following page. The majority of all publicly and privately assisted is clustered in or near Joliet. Wilmington, Bolingbrook and Romeoville also have larger concentrations of assisted housing.

No publicly or privately assisted housing exists in unincorporated areas in the southern half of the County. The map does show, however, that a number of large complexes do exist outside of racially/ethnically concentrated areas of poverty.

Figure 4-11 lists all subsidized housing in Will County. The majority of housing serves minority residents and female-headed households. The data also reveals that the majority of units are studios or 1-bedroom units.

In addition to the housing inventory described above, Cornerstone Services owns and manages 58 properties for people with developmental disabilities and mental illnesses. Within those 58 properties, Cornerstone manages 281 units of housing. The group also operates 150 subsidized, assisted housing units across the County through various programs such as HOPWA and Illinois' Bridge Subsidy.



Female-headed households and minority households are disproportionately represented in subsidized housing in Will County.

This trend also reveals the lack of affordable opportunities in the private sector for members of the protected classes.

Figure 4-11
Privately Assisted and HUD-Subsidized Housing, 2010

| Name | Funding Program | Total Units | Percent Occupied | Total People | % Female Head of HH | % Disabled Under 62 | % Disabled 62 and Up | % Age 62 and Up | % Minority | % 0-1 Bedrooms |
|--------------------------------|-----------------|--------------|------------------|--------------|---------------------|---------------------|----------------------|-----------------|------------|----------------|
| ANN STREET GROUP HOME | Other | 6 | 95 | 95 | - | - | - | - | - | - |
| BEECHER MANOR APTS. | LIHTC | 24 | 100 | - | - | - | - | - | - | - |
| BRAIDWOOD SENIOR HOUSING | LIHTC | 24 | 83 | - | - | - | - | - | - | - |
| EVERGREEN TERRACE I | S8 NC/SR | 241 | 82 | 479 | 94% | 2% | 0% | 0% | 99% | 56% |
| EVERGREEN TERRACE II | Other | 115 | 78 | 208 | 81% | 11% | 38% | 8% | 89% | 59% |
| GREENLEAF | S8 NC/SR | 321 | 98 | 366 | 75% | 85% | 13% | 94% | 44% | 76% |
| HIGH POINT APARTMENTS | LIHTC | 200 | 60 | - | - | - | - | - | - | - |
| INNSBRUCK APARTMENTS | S236 | 475 | 96 | - | - | - | - | - | - | - |
| LOUIS JOLIET APARTMENTS | LIHTC | 60 | 78 | - | - | - | - | - | - | - |
| MARGARET STREET GROUP HOME | Other | 6 | 100 | - | - | - | - | - | - | - |
| MARYCREST VILLAGE | S8 NC/SR | 57 | 99 | 70 | 75% | 100% | 2% | 96% | 31% | 100% |
| NEW HOPE TRUST RESIDENCES | Other | 18 | 97 | 12 | 50% | 100% | 100% | 33% | 25% | 100% |
| PINE MEADOWS APTS. | LIHTC | 178 | 60 | - | - | - | - | - | - | - |
| SALEM VILLAGE III | S236 | 242 | 99 | 102 | 81% | 56% | 9% | 91% | 15% | 100% |
| STEGER SENIOR HOUSING L.P. | LIHTC | 81 | 100 | - | - | - | - | - | - | - |
| THE TOWER | S8 NC/SR | 134 | 100 | 137 | 87% | 100% | 6% | 99% | 4% | 100% |
| THORNWOOD HOUSE | S236 | 183 | 100 | 161 | 52% | 100% | 33% | 50% | 78% | 100% |
| TRINITY GREEN GARDENS | Other | 20 | 98 | 20 | 25% | 100% | 100% | 5% | 30% | 100% |
| TRINITY HOUSING | Other | 13 | 99 | 24 | 50% | 100% | 100% | 8% | 21% | 100% |
| VICTORY SENIOR CENTRE | LIHTC | 56 | 100 | - | - | - | - | - | - | - |
| VICTORY SENIOR CENTRE PHASE II | LIHTC | 30 | 100 | - | - | - | - | - | - | - |
| WILCO RESIDENCES | Other | 24 | 100 | 24 | 25% | 100% | 100% | 21% | 29% | 100% |
| WILMINGTON RIVERVIEW APTS II | LIHTC | 24 | 100 | - | - | - | - | - | - | - |
| WILMINGTON SENIOR APARTMENTS | LIHTC | 56 | 89 | - | - | - | - | - | - | - |
| WINCHESTER MANOR APARTMENTS | S8 NC/SR | 24 | 97 | 25 | 75% | 100% | 0% | 63% | 0% | 100% |
| WINCHESTER MANOR APARTMENTS | LIHTC | 24 | 100 | - | - | - | - | - | - | - |
| Total | | 2,636 | 2,408 | 1,628 | 79% | 54% | 17% | 47% | 62% | 76% |

Note: HUD's Picture of Subsidized Housing data is given as is. Missing data is noted with a (-) mark. Additional properties with absolutely no data were excluded from this

Source: HUD, 2008 Picture of Subsidized Housing

I. Taxes

Taxes and Fair Housing

Taxes impact housing affordability. While not an impediment to fair housing choice in and of themselves, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

However, a straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others that are out of the jurisdiction's control must be considered when performing tax rate comparisons.

State legislation also directly affects a jurisdiction's ability to levy taxes. Property tax caps are in place in the collar counties around Chicago (DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will Counties) and suburban Cook County in an attempt to curb high increases in property taxes. Tax increases were mainly due to rapid increases in assessed housing value, a direct result of a booming housing market. These counties are now limited to yearly increases in local government collections to five percent, or the rate of inflation, whichever is less. This restriction hampers the ability of local governments to match service needs with revenue.

In order to achieve uniform property assessment across all counties, Illinois calculates a yearly equalization factor, or multiplier, that is part of the property tax equation. Equalization is calculated by comparing a county's market value (actual selling price) with assessed values (assigned by the County). In Will County in 2009, the assessed value was equal to 33.24% of the fair market value of a property. Therefore, property taxes in a jurisdiction are equal to the assessed value multiplied by the applicable composite tax rate.

Tax rates are levied on every \$100 dollars of assessed value. Composite taxes are aggregates of a variety of taxing districts, including the County, the city, and local school districts, among others.

Tax Rates within Will County

Taxing districts in Will County are varied, both in geography covered and tax rate imposed. Districts include:

County: taxing districts for Will County, Will County Building Commission, and Will County Forest Preserve

Townships: taxing districts for 24 townships and township road funds

Municipalities: taxing districts for 36 municipalities

School Districts: taxing districts for 43 school districts, including elementary schools, high schools, unit districts and community colleges

Fire Protection Districts: taxing districts for 27 fire protection areas

Park Districts: taxing districts for 22 parks

Library Districts: taxing districts for 22 libraries

Miscellaneous Districts: 16 taxing districts for water, reclamation, mosquito abatement, multi-township assessments, and lighting

Although most revenues are traditionally raised through four main taxing districts (county, township, municipality and school district), smaller taxing districts are increasing in popularity in the counties affected by the previously

mentioned tax cap, including Will County. These smaller districts, with specific functions such as providing funds for fire protection, mosquito abatement, or libraries, are traditionally used in Illinois as a way to circumvent rate limits on taxing bodies.

Figure 4-12
Tax Rates in Will County, 2011

| Jurisdiction | 2011 Tax Rate | Jurisdiction | 2011 Tax Rate |
|-----------------------|---------------|-------------------------|---------------|
| Will County | 0.7244 | | 0.7244 |
| Reed township | 0.0624 | Crete township | 0.5358 |
| DuPage township | 0.0708 | Woodridge village** | 0.5922 |
| Wheatland township | 0.0831 | Beecher village | 0.602 |
| Symerton village | 0.0897 | Wilton township | 0.6139 |
| Godley village | 0.1159 | Channahon village | 0.6164 |
| Channahon township | 0.1378 | Washington township | 0.6961 |
| Troy township | 0.1509 | Bolingbrook village | 0.6968 |
| Plainfield township | 0.1804 | Manhattan village | 0.698 |
| Wilmington township | 0.1992 | Custer township | 0.6986 |
| Mokena village | 0.2155 | Minooka village | 0.6987 |
| Lockport township | 0.2254 | Orland Park village** | 0.7125 |
| Rockdale village | 0.2547 | Naperville city* | 0.744 |
| New Lenox township | 0.256 | Wilmington city | 0.7698 |
| Manhattan township | 0.2816 | Lockport city | 0.8287 |
| Shorewood village | 0.2828 | Will township | 0.8509 |
| Frankfort township | 0.2852 | Peotone village | 0.9488 |
| New Lenox village | 0.2938 | Romeoville village | 1.1593 |
| Joliet township | 0.2994 | Coal City village | 1.2648 |
| Elwood village | 0.3116 | Braidwood city | 1.291 |
| Florence township | 0.3164 | Crete village | 1.2985 |
| Jackson township | 0.3365 | Joliet city* | 1.3291 |
| Frankfort village | 0.3392 | Monee village | 1.3543 |
| Peotone township | 0.3538 | Tinley Park village** | 1.3597 |
| Lemont village** | 0.3739 | Steger village** | 1.5259 |
| Wesley township | 0.3945 | Aurora city* | 1.9052 |
| Monee township | 0.4218 | University Park village | 4.196 |
| Plainfield village | 0.4297 | Sauk Village village | 5.4741 |
| Homer township | 0.4362 | Park Forest village** | 6.8619 |
| Green Garden township | 0.4673 | Braceville village | 0 |
| Diamond village** | 0.4871 | Homer Glen village *** | - |
| Crest Hill city | 0.4977 | Matteson Village **** | - |

* Federal CDBG entitlement community

** CDBG opt-out community

*** Homer Glen has not levied a property tax since its incorporation in 2001

**** Matteson Village does not have taxable land within Will County

Because of the wide assortment of tax districts and rates, the numbers shown are not composite tax rates. Such rates would be too numerous throughout the County. The rates do show areas of especially high tax rates for specific districts.

Range of Tax Rates

When broken down into its component parts, the bulk of the revenue collected in property taxes is shown to support school districts. Of all tax districts, school districts account for 36 of the 40 highest rate tax districts in the County. Townships have relatively low tax rates, accounting for seven of the ten lowest tax rates in the County among municipalities and townships. Municipalities vary largely, with some of the lowest tax rates comparable to township rates and some of the highest tax rates competing with the highest school district rates.

The range of tax rates varies largely. Among municipalities and townships, tax rates range from 0.0624 in Reed Township to 6.8619 in Park Forest. While there is a wide range of tax rates in the County, the average tax rate for municipalities and townships is 0.8028 and the median tax rate is 0.4673. Both numbers are significantly closer to the lower range of tax rates in the County.

The map on the following page shows the tax rates for municipalities and townships throughout the County. The highest tax rates are generally clustered in the southern half of the County.



Townships in the southern half of the County generally have higher tax rates than those in the northern half.

While townships generally have lower tax rates than municipalities because they offer fewer services, the townships in the southern half of the County have higher rates than townships in the north. Higher rates limit housing choice for LMI persons to live in these areas.

Illinois Laws Affecting Tax Rates

Illinois' policy of requiring reassessment every four years minimizes inequity in the system of taxation, as changes in assessed value keep pace with changes in market value across the board. In states that do not require periodic reassessment, the assessed values of years long past continue to apply to 1) neighborhoods that are in decline, resulting in over-taxation on poorer residents, and 2) neighborhoods where values have increased, resulting in under-taxation on those who are prospering.

Illinois law provides property tax relief for targeted policy outcomes and special-needs populations through a number of exemptions and credits, including a General Homestead Exemption (which effectively reduces equalized assessments by \$6,000) and exemptions for disabled veterans, returning veterans and homestead improvement. Programs for seniors and veterans include additional homestead exemptions and an assessment freeze. It is the property owner's responsibility to apply for these as provided by law.

According to recent data from the Illinois Comptroller's office, most local governments and school districts in the state lean heavily on real estate tax revenues. Dependency varies from less than one-third of revenues for counties and municipalities to half of revenues for school districts and more

than half of revenues for some special districts. The Property Tax Extension Limitation Law (PTELL) represents an effort to limit the impact of rising property taxes. However, further diversification remains a desirable aim in restructuring the funding systems of local governments and school districts.

J. Public Transit

Transit and Fair Housing

Households without a vehicle, which in most cases are primarily low-moderate income households, are at a disadvantage in accessing jobs and services if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas (of concentrations of minority and LMI persons) and employment opportunities are key to expanding fair housing choice.

Ridership in Will County

According to the 2006-10 American Community Survey, there were 8,054 transit-dependent households in Will County, comprising 3.7% of all households.

The vast majority of County residents (89.6%) drove to work, with 81.7% driving alone. Throughout Will County, only 4.4% of residents utilized public transportation to get to work. Black and Asian households were far more likely to use public transportation to travel to work than White households and Hispanic households. Across the County, only 4% of White households used public transit, compared to 7.1% of Black households and 7.3% of Asian households. Hispanic households were significantly less like to use public transportation (2.4%), but had higher rates of carpooling with 14% of Hispanics carpooling to work, compared to 7.9% of all County residents carpooling.

Figure 4-13
Means of Transportation to Work by Race/Ethnicity, 2010

| Means of Transportation to Work | Total | | White | | Black | | Asian | | Hispanic | |
|---------------------------------------|----------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Drove vehicle alone | 256,366 | 81.7% | 208,166 | 83.2% | 22,976 | 77.6% | 9,271 | 70.1% | 33,098 | 78.2% |
| Carpool | 24,928 | 7.9% | 17,540 | 7.0% | 2,516 | 8.5% | 2,116 | 16.0% | 5,936 | 14.0% |
| Public transportation | 13,674 | 4.4% | 9,935 | 4.0% | 2,088 | 7.1% | 964 | 7.3% | 1,025 | 2.4% |
| Walked | 3,136 | 1.0% | 2,217 | 0.9% | 624 | 2.1% | 25 | 0.2% | 455 | 1.1% |
| Taxi, motorcycle, bike or other means | 3,584 | 1.1% | 2,244 | 0.9% | 509 | 1.7% | 268 | 2.0% | 740 | 1.7% |
| Worked at home | 12,186 | 3.9% | 10,065 | 4.0% | 893 | 3.0% | 572 | 4.3% | 1,084 | 2.6% |
| Total | 313,874 | 100.0% | 250,167 | 100.0% | 29,606 | 100.0% | 13,216 | 100.0% | 42,338 | 100.0% |

Source: 2006-10 American Community Survey (B08105A, B08105B, B08105D, B08105I, B08301)

Affordable housing providers interviewed reported that there remains a substantial lower-income minority population that is not transit dependent. By virtue of vehicle access, this population is not bound in locational choice to areas of the County that are within walking distance of transit routes. In addition, people with disabilities who are enrolled with the Illinois Circuit Breaker program also can ride for free on any Metra train.

Transit Coverage

Out of 62 municipalities and townships in Will County, 26 completely lack any transit service. These areas are clustered in the rural southern half of the County. The northern half of the County is served by various bus routes and four commuter rail lines. The map on the following page illustrates the areas of Will County within a half-mile walk of a transit stop.



Out of 62 jurisdictions in Will County, 26 do not receive regular service from a fixed-route transit provider.

Residents of rural townships in the County's southern half are especially isolated from service, due to the financial infeasibility of extending routes to sparsely developed areas. The lack of transit service in these communities presents a barrier to the development of affordable housing for members of the protected classes who depend on transit to access jobs, medical facilities and other necessary amenities.

Regional Transportation Authority

Public transportation in Will County falls under the Regional Transportation Authority (RTA), which provides public transportation for six counties in Northeastern Illinois, including Cook, DuPage, Kane, Lake, McHenry, and Will. The RTA provides public transportation through three divisions: Chicago Transit Authority (CTA), which provides bus and rail services within the city of Chicago; PACE, which provides suburban bus service; and Metra, which provides commuter rail service. According to its website, RTA is the second largest public transportation system in North America and provides more than two million rides a day. On its own, Pace was the 43rd largest transit agency in the country in 2010, providing 32 million transit trips, and Metra was the 24 largest transit system in the country by ridership, providing over 70 million passenger trips throughout the Chicago area in 2010.⁸

Fare Hikes and Service Cuts

RTA has experienced budget limitations over the past five years, but managed to avoid drastic service cuts and decreases in service through several one-time financial transfers and a change in the tax distribution law in 2008. However, the economic downturn, in particular a drop in sales tax revenue from which RTA agencies receive part of their funding, has created financial challenges. Pace borrowed money from the State of Illinois to avoid fare increases; however, service cutbacks proved unavoidable. Since those service cuts, Pace fares have remained steady.

Conversely, Metra chose to increase fares rather than reduce service. Fare rates on Metra rose 26.9% in February 2012, the largest fare increase in Metra's 30-year history. Despite the significant hike in fares, Metra is again considering raising fares on its commuter rail lines to increase the organization's capital reserve and limit any future fare spikes. No decisions

⁸ American Public Transit Association, "2012 Fact Book," *Appendix B*, www.apta.com, November 1, 2012.

have been made about whether such a fare increase would occur and what percent such a hike would be.⁹

a. Destinations and Routes

Bus routes in Will County are clustered in four areas: Joliet, Bolingbrook, Aurora and the University Park area. Many routes link riders with transportation hubs such as Union Station in Joliet or to other Metra stations. Some additional express routes connect other parts of the Urban County to downtown Chicago, acting largely as daytime commuter routes. Many routes do not offer late night or weekend service, making the routes unreliable for many workers.

In addition, Will County is served by four Metra routes, the Rock Island District line, the Heritage Corridor line, the South West Service line, and the Metra Electric Main line. Joliet Union Station is the terminus for the first two lines. The South West Service line ends in Manhattan Village, and the Metra Electric line has a single stop in Will County located in University Park.

The maps on the following pages show transit coverage in Will County as it relates to public housing, employment centers and lower-income households. The maps show that a significant cluster of jobs and homes are not served by any type of transit.



For those communities served by transit, routes are often express service with limited late night or weekend hours.

For residents working second shifts or jobs with irregular hours, the lack of transit service outside of daytime, weekday hours is an impediment to housing choice in parts of Will County.

b. Accessibility

All Pace fixed-route buses are equipped with wheelchair lifts or ramps, in accordance with the American with Disabilities Act (ADA). For those unable to access fixed-route bus services, Pace provides ADA paratransit services throughout the region. Pace Paratransit service offers door-to-door service for persons who are certified by the Regional Transportation Authority as persons with disabilities. This service is provided within three-quarters of a mile of fixed route service and mirrors fixed route service hours and days.

All Metra trains are equipped for people with disabilities; however, not all stations are accessible for passengers. According to Metra, 69.5% of all stations are fully accessible and an additional 9.6% are partially accessible. As a percent of all boardings, accessible stations account for 90.4%, meaning the busiest stations have been equipped to be accessible. Within Will County, all Metra stations are fully accessible with the exception of Joliet Union Station on the Heritage Corridor line.

⁹ Bob Robers, "Metra Riders Asked to 'Pick Poison' on Fair Hikes," *CBS Local News*, www.chicago.cbslocal.com, November 1, 2012.

c. Transportation Planning

2030 Transportation Plan

In order to promote the best possible use of limited resources to serve the transportation needs of County residents, the Will County Department of Highways produced the Will County 2030 Transportation Plan investment strategy document. The document outlines the department's goals and objectives for future projects, which include:

- Improve mobility and accessibility
- Support land development
- Provide acceptable transportation performance
- Develop a connected non-motorized system
- Protect environmental and natural resources
- Promote interagency coordination
- Use financial resources efficiently
- Commit to plan implementation

Recommended Improvements

To accomplish these goals, the plan recommends transportation improvements for all modes including public transit. Many transit investments are geared toward improved commuter rail into downtown Chicago, including a new multi-modal station at Joliet's Union Station. One new proposed rail transit line, the STAR line, would connect multiple suburban centers without entering Chicago. This type of service would improve transit access for those needing to commute between suburbs.

Recommended bus service improvements largely aim to connect Will County with downtown Chicago. Other high-ranking improvements include connections between areas of Will County and downtown Joliet, proposed Metra Southeast Service which would offer travel to the Loop and back from parts of Will County, as well as the construction of new transit centers.

Transit-Oriented Development

One of the primary goals envisioned in the plan is the encouragement of transit-oriented developments (TODs) anchored around the region's rail stations and transit facilities. TODs are higher density, mixed-use developments around transit facilities that encourage transit use. Such locations provide an opportunity for the inclusion of an affordable housing component, providing members of the protected classes greater housing choice and proximity to transit services.

Two communities, New Lenox and University Park, have completed TOD plans for their communities. The plans would encourage development and redevelopment in and around Metra commuter rail stations. While both plans encourage dense, mixed-use developments that include multi-family units, neither plan actively addresses an affordable housing component.

d. **Mobility Manager**

To further aid in the development and furtherance of transit in Will County, a mobility manager was recently hired with a grant from the Regional Transportation Authority. The position, within the Office of the Will County Executive, will coordinate paratransit service options and seek to expand safe and accessible paratransit transportation to the eastern part of Will County, an area currently underserved by transit. Presently, paratransit routes serve 600 riders per month.

➤ Fair Housing Achievement

Will County recently hired a Mobility Manager to coordinate paratransit operations and expand safe and accessible transit to the eastern part of Will County.

This initiative should result in better transit options for LMI persons living in the less populated areas of Will County and, as a result, expand their housing choice.

5. Private Sector Policies

A. Mortgage Lending Practices

Home Mortgage Disclosure Act

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

Using HMDA

The most recent HMDA data available for Will County is from 2009 to 2011. Reviewing this data helps to determine the need to encourage area lenders, other business lenders and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units across the entire County. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

Figure 5-1 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis. Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.

Figure 5-1
Cumulative Mortgage Data Summary Report, 2009-2011

| | Total Applications* | | Originated | | Approved Not Accepted | | Denied | | Withdrawn/Incomplete | |
|---------------------------|---------------------|---------------|---------------|--------------|-----------------------|-------------|---------------|--------------|----------------------|--------------|
| | # | % | # | % | # | % | # | % | # | % |
| Loan Purpose | | | | | | | | | | |
| Home purchase | 30,554 | 21.2% | 14,747 | 48.3% | 1,088 | 3.6% | 2,921 | 9.6% | 11,266 | 36.9% |
| Refinancing | 110,310 | 76.6% | 56,194 | 50.9% | 4,279 | 3.9% | 14,810 | 13.4% | 31,475 | 28.5% |
| Home improvement | 3,213 | 2.2% | 1,390 | 43.3% | 154 | 4.8% | 1,050 | 32.7% | 513 | 16.0% |
| Loan Type | | | | | | | | | | |
| Conventional | 105,722 | 73.4% | 56,309 | 53.3% | 4,045 | 3.8% | 14,003 | 13.2% | 28,303 | 26.8% |
| FHA | 35,529 | 24.7% | 14,671 | 41.3% | 1,361 | 3.8% | 4,459 | 12.6% | 13,985 | 39.4% |
| VA | 2,668 | 1.9% | 1,293 | 48.5% | 113 | 4.2% | 307 | 11.5% | 885 | 33.2% |
| FSA/RHS | 158 | 0.1% | 58 | 36.7% | 2 | 1.3% | 12 | 7.6% | 81 | 51.3% |
| Property Type | | | | | | | | | | |
| One to four-family unit | 143,776 | 99.8% | 72,182 | 50.2% | 5,503 | 3.8% | 18,683 | 13.0% | 43,219 | 30.1% |
| Manufactured housing unit | 301 | 0.2% | 149 | 49.5% | 18 | 6.0% | 98 | 32.6% | 35 | 11.6% |
| Applicant Race | | | | | | | | | | |
| Native American | 523 | 0.4% | 206 | 39.4% | 31 | 5.9% | 148 | 28.3% | 110 | 21.0% |
| Asian | 7,867 | 5.5% | 4,952 | 62.9% | 378 | 4.8% | 926 | 11.8% | 1,409 | 17.9% |
| Black | 6,975 | 4.8% | 2,912 | 41.7% | 386 | 5.5% | 1,569 | 22.5% | 1,815 | 26.0% |
| Hawaiian | 378 | 0.3% | 184 | 48.7% | 22 | 5.8% | 58 | 15.3% | 95 | 25.1% |
| White | 100,818 | 70.0% | 57,994 | 57.5% | 4,168 | 4.1% | 13,488 | 13.4% | 22,289 | 22.1% |
| No information | 12,372 | 8.6% | 6,018 | 48.6% | 530 | 4.3% | 2,577 | 20.8% | 2,478 | 20.0% |
| Not applicable | 15,144 | 10.5% | 65 | 0.4% | 6 | 0.0% | 15 | 0.1% | 15,058 | 99.4% |
| Hispanic* | 9,008 | 6.3% | 4,166 | 46.2% | 418 | 4.6% | 1,955 | 21.7% | 2,063 | 22.9% |
| Total | 144,077 | 100.0% | 72,331 | 50.2% | 5,521 | 3.8% | 18,781 | 13.0% | 43,254 | 30.0% |

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

* Hispanic ethnicity is counted independently of race.

1. Home Mortgage Trends

Across Will County during the last three years, lenders received 110,310 applications for mortgage refinancing, 30,554 applications for home purchase mortgages, and 3,213 applications for home improvement equity loans.

Refinancing loans were the most likely to be successful, with 50.9% of loans originated. This represents a higher rate of origination than home purchase and home improvement loans even with a higher number of refinancing applications. A lower percent, 28.5%, of refinancing loans were withdrawn or incomplete and 13.4% were denied.

In home purchase loan applications, 48.3% were originated, nearly 37% were withdrawn or left incomplete, and 9.6% were denied. Of the home improvement applications, which represent a much smaller total number, a much higher percentage, 32.7% were denied outright.

Figure 5-2

Loan Application Type by Race and Ethnicity, 2009-2011

| | Total | White | Black | Asian | Other | No data | Hispanic* |
|-------------------------|--------------------------|-------------------------|-----------------------|-----------------------|---------------------|------------------------|-----------------------|
| Home purchase | 30,554 21.2% | 20,573 20.4% | 2,362 33.9% | 1,410 17.9% | 259 28.7% | 5,950 21.6% | 2,734 30.4% |
| Refinance | 110,310 76.6% | 78,040 77.4% | 4,343 62.3% | 6,331 80.5% | 596 66.1% | 21,000 76.3% | 6,033 67.0% |
| Home improvement | 3,213 2.2% | 2,205 2.2% | 270 3.9% | 126 1.6% | 46 5.1% | 566 2.1% | 241 2.7% |
| Total | 144,077 100.0% | 100,818 70.0% | 6,975 4.8% | 7,867 5.5% | 901 0.6% | 27,516 19.1% | 9,008 6.3% |

Note: Percentages within racial/ethnic groups are calculated within each group's total.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009 to 2011

2. Applicant Characteristics

Applications by Purpose of Loan

Across racial and ethnic groups, loan application types were generally similar, with refinancing as the most common loan type across all groups. This type of loan constituted 76.6% of all applications, 77.4% of applications for Whites and 80.5% for Asians. Blacks and Hispanics were somewhat less likely to refinance as this loan type represented 67% of Hispanic applications and only 62.3% of Black applications. Blacks and Hispanics, on the other hand, were the most likely to apply for a home purchase, with 33.9% of overall Black applications and 30.4% of overall Hispanic applications.

Applications by Type of Home

The vast majority of applications involved one-to-four family housing structures, with only 301 applications (less than 1%) requesting financing for manufactured units. The denial rate for manufactured units, 32.6%, was substantially higher than the overall denial rate of 13% for all housing types.

Applications by Type of Loan

The most commonly sought type of financing was conventional loans, a category that represented almost three-quarters of all loan applications. An additional 24.7% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. Smaller percentages of applications were for loans backed by the Department of Veteran Affairs (VA) and the Farm Services Administration or Rural Housing Service (FSA/RHS).

Applications by Race and Ethnicity

The racial and ethnic composition of loan applicants differs somewhat from the County's general demographic distribution. While 11.2% of all Will County households in 2010 were Black, only 6% of the loan applications for which racial/ethnic data were reported were Black. In addition, White households are overrepresented among mortgage applicants, representing a share of applications exceeding their share of households countywide (86.5% of applications compared to 76.0% of all households). Asian and



Hispanic applicants represented 6.7% and 7.7% of applications, respectively. For the Asian population, this rate is higher than their share of population at 4.6%. For the Hispanic population, the number of applications is almost half their 15.6% share of the County's population in 2010.

Lower participation in the market for home mortgages by Black and Hispanic households is likely a reflection of the lower median income of these minority groups.

3. Geographic Distribution of Approvals by Lender

Figure 5-3 provides a summary of the top ten lenders in the County based on total number of loan originations between 2009 and 2011. Wells Fargo Bank was the top lender in the County, with over 8,500 originations during the three-year period, accounting for 11.9% of all loans originated in the County. JP Morgan Chase Bank was the second lender in terms of originations, with 8,150 and 11.3% of all originations. The next highest bank, Bank of America, accounted for just over half of JP Morgan Chase's originations with a total of 6.1% of all loan originations.

Figure 5-3

Top 10 Lenders in Will County by Number of Originations, 2009-2011

| Lending Institution | # of Loans Originated | % of Total Loans Originated |
|--|-----------------------|-----------------------------|
| Wells Fargo Bank, NA | 8,585 | 11.9% |
| JPMorgan Chase Bank, NA | 8,150 | 11.3% |
| Bank of America, NA | 4,395 | 6.1% |
| Fifth Third Mortgage Company | 2,266 | 3.1% |
| Harris Bank, NA | 2,005 | 2.8% |
| US Bank, NA | 1,946 | 2.7% |
| Wintrust Mortgage Company | 1,837 | 2.5% |
| PNC Bank, NA | 1,762 | 2.4% |
| Mortgage Services III, L.L.C. | 1,596 | 2.2% |
| Guaranteed Rate, Inc. | 1,573 | 2.2% |
| Total Loans Originated Countywide | 72,331 | 100.0% |

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Map 5-1 illustrates the distribution of originations for the top ten lenders, with each dot representing 20 mortgage loan originations. The racially/ethnically concentrated areas of poverty have significantly fewer originations than other areas. Those loan originations in the racially/ethnically concentrated areas of poverty are generally given by the three largest lending institutions.

4. Mortgage Application Denials

Reasons for Denials

During the years 2009 through 2011, a total of 18,781 mortgage loan applications were denied across Will County. The overall cumulative denial rate was 13.0% with denials by race and ethnicity ranging from 13.4% for Whites to 28.3% for Native Americans.

In reporting denials, lenders are required to list at least one primary reason for the denial and may list up to two secondary reasons. As Figure 5-4 demonstrates, the primary basis for the rejection of a majority of loan

applications was a lack of collateral (25.8%), followed by the applicant's debt-to-income ratio. A substantial proportion of denials included no given reason (12.4%).

Denials and the Protected Classes

For the protected classes, the denial rate on the basis of credit history was particularly high for Blacks, representing more than a quarter of those denials. Hispanic applicants also were denied on a substantially higher basis for their debt-to-income ratio.

Figure 5-4

Primary Reason for Mortgage Application Denial by Race/Ethnicity, 2009-2011

| | Total | White | Black | Asian | Other | Hispanic* | No Info |
|--------------------------|-------|-------|-------|-------|-------|-----------|---------|
| Collateral | 25.8% | 26.7% | 21.2% | 26.2% | 19.9% | 24.1% | 24.2% |
| Debt-to-income ratio | 18.7% | 18.5% | 19.2% | 22.5% | 23.3% | 24.0% | 18.1% |
| Incomplete application | 14.3% | 14.2% | 9.5% | 15.3% | 8.7% | 11.1% | 18.1% |
| Credit history | 13.2% | 11.8% | 25.4% | 6.2% | 24.8% | 16.7% | 14.8% |
| No reason reported | 12.4% | 13.1% | 11.8% | 9.3% | 13.1% | 8.7% | 10.0% |
| Other | 9.4% | 9.6% | 7.8% | 11.9% | 4.4% | 7.3% | 9.3% |
| Unverifiable information | 2.9% | 3.0% | 1.8% | 4.5% | 4.4% | 4.8% | 2.5% |
| Insufficient cash | 1.6% | 1.5% | 2.0% | 2.4% | 0.5% | 1.4% | 1.8% |
| Employment history | 1.1% | 1.2% | 0.8% | 1.5% | 0.5% | 1.4% | 1.0% |
| Insurance denied | 0.4% | 0.4% | 0.3% | 0.2% | 0.5% | 0.4% | 0.3% |

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Native Americans, Blacks and Hispanics had mortgage denial rates significantly higher than Whites.

Denials on the basis of credit history were almost double for Black applicants than White applicants.

5. Income and Mortgages

Classifying Income

For this analysis, lower-income households include those with incomes between 0% and 80% of median family income (MFI), while upper-income households include households with incomes above 80% MFI. Applications made by lower-income households accounted for 33.5% of all denials between 2009 and 2011, although they accounted for only 22.1% of total applications for those three years.

Denials by Income, Race and Ethnicity

Figure 5-5 distributes the denials by income level among racial and ethnic groups. Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 19.8%, the denial rates for lower-income Other Race households (consisting primarily of Native Americans), Blacks, and Hispanics were 35.9%, 29.4% and 26.3%

respectively. Lower income Asian applicants experienced a denial rate of 22.4%, which was slightly higher than the 19.8% average denial rate.

While denial rates were generally lower for upper-income households, differences persisted across racial and ethnic groups. The overall upper-income denial rate was 12.6%, compared to 10.3% for Asians, 12.1% for Whites, 18.4% for Other Races, and 22.8% for Blacks. Lower-income White households were less likely to experience denial than upper-income Black and Hispanic households. This pattern is consistent with discrimination.

Map 5-2 on the following page illustrates census tracts in Will County that experienced mortgage denial rates above 20.0%, which is significantly higher than the County's overall denial rate of 13.0%.

Figure 5-5

Mortgage Application Denials by Household Race/Ethnicity, 2009-2011

| | | Total | White | Black | Asian | Other | No data | Hispanic* |
|---------------------|--------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Lower-Income | Total Applications | 31,839 | 24,425 | 2,149 | 951 | 270 | 4,044 | 3,884 |
| | Denials | 6,294 | 4,554 | 631 | 213 | 97 | 799 | 1,023 |
| | % Denied | 19.8% | 18.6% | 29.4% | 22.4% | 35.9% | 19.8% | 26.3% |
| Upper-Income | Total Applications | 89,125 | 66,497 | 3,626 | 6,578 | 553 | 11,871 | 4,087 |
| | Denials | 11,187 | 8,058 | 827 | 675 | 102 | 1,525 | 823 |
| | % Denied | 12.6% | 12.1% | 22.8% | 10.3% | 18.4% | 12.8% | 20.1% |
| Total | Total Applications | 144,077 | 100,818 | 6,975 | 7,867 | 901 | 27,516 | 9,008 |
| | Denials | 18,781 | 13,488 | 1,569 | 926 | 206 | 2,592 | 1,955 |
| | % Denied | 13.0% | 13.4% | 22.5% | 11.8% | 22.9% | 9.4% | 21.7% |

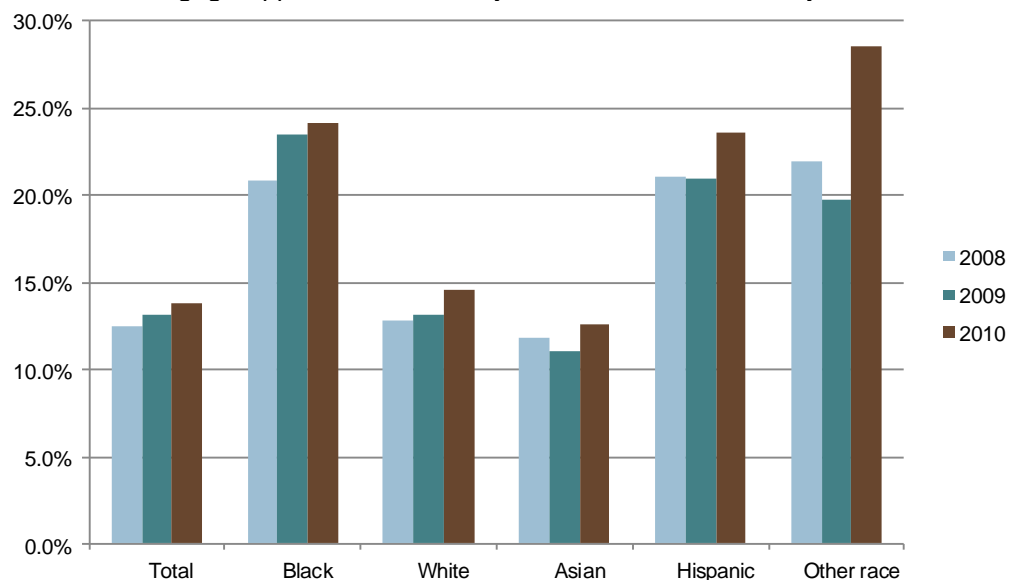
Note: Total also includes 23,113 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Figure 5-6

Trends in Mortgage Application Denials by Household Race/Ethnicity, 2009-2011



Source: Federal Financial Institutions Examination Council, 2009 to 2011



Over the course of the three years studied, upper-income Black and Hispanic households received mortgage application denials more often than lower-income White households.

6. High-Cost Lending

Defining High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities
- A second-lien loan with an interest rate at least five percentage points higher than the standard

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

High-Cost Loans in Will County

Between 2009 and 2011, there were 72,331 home purchase, refinance or home improvement loans made for single-family or manufactured units in Will County. Of this total, 65,478 disclosed the borrower’s household income and 1,646 reported high-cost mortgages. Overall, upper-income households

were significantly less likely to have high-cost mortgages as lower-income households.

High-Cost Loans and Race/Ethnicity

An analysis of loans in Will County by race and ethnicity reveals that Black households are overrepresented in high-cost lending. Among lower-income minority households, 7.4% of mortgages obtained by Blacks were high-cost, compared to 3.6% of the mortgages obtained by lower-income White households and 2.1% of Asian households. Lower-income Hispanic households also had a relatively high percentage of high-cost mortgages with 6.1%.

Similar trends were apparent among upper-income households. Asian households were the least likely to have high-cost mortgages (0.6%) while White households experienced a high-cost rate of 1.6%. Black households experienced a high-cost loan rate almost three times the rate of Whites (4.4%). While lower-income Hispanic households had a relatively high percentage of high-cost mortgages, upper-income Hispanics had a share of high-cost mortgages (2.5%) that was much more in line with White households. Details appear in Figure 5-7.

Map 5-3 on the following page depicts the distribution of high-cost loans by census tract across the County and highlights census tracts with high-cost rates of 3% or more (greater than the County average of 2.3%). Of the 82 census tracts (based on the 2000 Census), 12 tracts had high-cost loan rates of 3% or more. High-cost areas are concentrated in and around Joliet as well as Crete Township. Both include areas that are designated as racially/ethnically concentrated areas of poverty.

Figure 5-7
High-Cost Loans by Race and Ethnicity, 2009-2011

| | | Total | White | Black | Asian | Other | No data | Hispanic* |
|---------------------|--------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Lower-Income | Total Originations | 15,372 | 12,873 | 775 | 485 | 87 | 1,152 | 1,645 |
| | High-Cost | 570 | 462 | 57 | 10 | 4 | 37 | 100 |
| | % High-Cost | 3.7% | 3.6% | 7.4% | 2.1% | 4.6% | 3.2% | 6.1% |
| Upper-Income | Total Originations | 50,106 | 39,850 | 1,551 | 4,286 | 262 | 4,157 | 2,014 |
| | High-Cost | 815 | 643 | 68 | 24 | 7 | 73 | 50 |
| | % High-Cost | 1.6% | 1.6% | 4.4% | 0.6% | 2.7% | 1.8% | 2.5% |
| Total | Total Originations | 72,331 | 57,994 | 2,912 | 4,952 | 390 | 6,083 | 4,166 |
| | High-Cost | 1,646 | 1,313 | 157 | 37 | 12 | 127 | 171 |
| | % High-Cost | 2.3% | 2.3% | 5.4% | 0.7% | 3.1% | 2.1% | 4.1% |

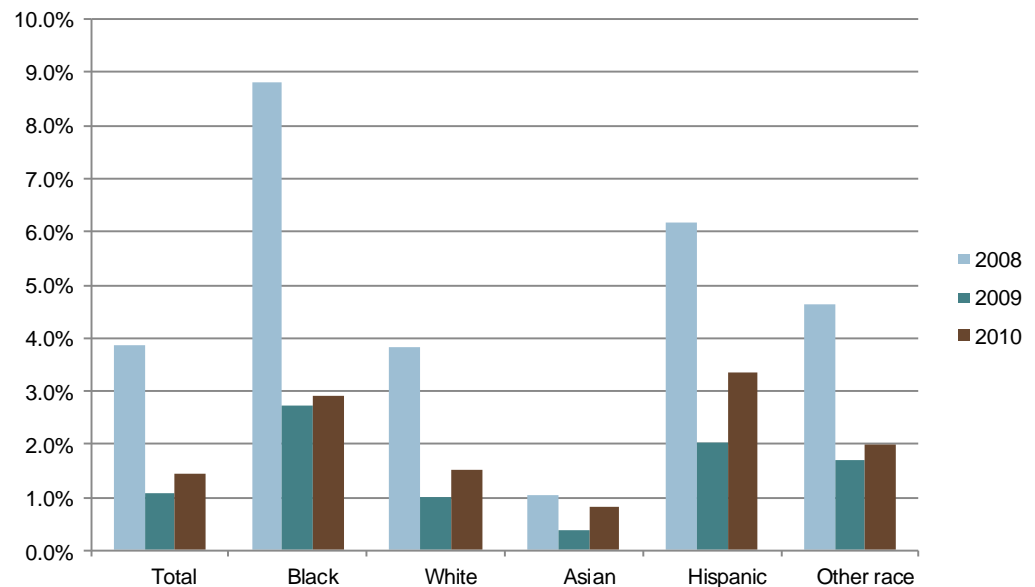
Note: Total also includes 6,853 loans for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Figure 5-8

Trends in High-Cost Loans by Race and Ethnicity, 2009-2011



Source: Federal Financial Institutions Examination Council, 2009 to 2011



Black households, both higher-income and lower-income, are more likely to receive high-cost mortgages than other racial and ethnic groups.

7. Annual Trends in Mortgage Lending

Historic Lending Trends

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 5-9 illustrates this annual change.

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2009 as a result of buyer reluctance in an unstable market, and the number of applications in Will County follows this trend. The number of applications declined 19.2% between 2009 and 2010, and dropped 14.9% between 2010 and 2011. This is a total drop of 18,012 applications or 31.2% over the three year period from 2009 to 2011.

Change in Lending by Race and Ethnicity

Over this period, the percentage of total applications that resulted in loan originations increased between 2009 and 2010, and then decreased between 2010 and 2011. For individual racial and ethnic groups, this trend varied widely. Originations among Black applicants decreased between 2009 and 2010, and increased between 2010 and 2011. Originations among White, Asian, and Hispanic households on the other hand, increased yearly.

The number of loans that were high-cost dropped significantly between 2009 and 2010, but climbed slightly between 2010 and 2011. This is true across all racial categories. The initial drop can likely be attributed to increasing statutory control over predatory lending practices. The slight rise, however, is inconsistent with national trends and should be monitored in the coming years.

Figure 5-9

High-Cost Home Purchase Loans by Race and Ethnicity, 2009-2011

| | 2009 | | 2010 | | 2011 | |
|-------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| | # | % | # | % | # | % |
| Total loans | | | | | | |
| Applied for | 57,725 | 100.0% | 46,639 | 100.0% | 39,713 | 100.0% |
| Black | 2,992 | 5.2% | 2,146 | 4.6% | 1,837 | 4.6% |
| White | 40,507 | 70.2% | 33,452 | 71.7% | 26,859 | 67.6% |
| Asian | 2,912 | 5.0% | 2,821 | 6.0% | 2,134 | 5.4% |
| Hispanic* | 3,761 | 6.5% | 2,802 | 6.0% | 2,445 | 6.2% |
| Other race | 402 | 0.7% | 278 | 0.6% | 221 | 0.6% |
| No information/NA | 10,908 | 18.9% | 7,942 | 17.0% | 8,662 | 21.8% |
| Originated | 28,449 | 49.3% | 24,015 | 51.5% | 19,867 | 50.0% |
| Black | 1,247 | 41.7% | 877 | 40.9% | 788 | 42.9% |
| White | 23,084 | 57.0% | 19,137 | 57.2% | 15,773 | 58.7% |
| Asian | 1,793 | 61.6% | 1,794 | 63.6% | 1,365 | 64.0% |
| Hispanic* | 1,698 | 45.1% | 1,281 | 45.7% | 1,187 | 48.5% |
| Other race | 172 | 42.8% | 118 | 42.4% | 100 | 45.2% |
| No information/NA | 2,153 | 19.7% | 2,089 | 26.3% | 1,841 | 21.3% |
| Originated - High Cost | 1,097 | 3.9% | 259 | 1.1% | 290 | 1.5% |
| Black | 110 | 8.8% | 24 | 2.7% | 23 | 2.9% |
| White | 881 | 3.8% | 195 | 1.0% | 237 | 1.5% |
| Asian | 19 | 1.1% | 7 | 0.4% | 11 | 0.8% |
| Hispanic* | 105 | 6.2% | 26 | 2.0% | 40 | 3.4% |
| Other race | 8 | 4.7% | 2 | 1.7% | 2 | 2.0% |
| No information/NA | 79 | 3.7% | 31 | 1.5% | 17 | 0.9% |
| Denied | 7,173 | 12.4% | 6,113 | 13.1% | 5,495 | 13.8% |
| Black | 622 | 20.8% | 504 | 23.5% | 443 | 24.1% |
| White | 5,170 | 12.8% | 4,395 | 13.1% | 3,923 | 14.6% |
| Asian | 344 | 11.8% | 313 | 11.1% | 269 | 12.6% |
| Hispanic* | 791 | 21.0% | 588 | 21.0% | 576 | 23.6% |
| Other race | 88 | 21.9% | 55 | 19.8% | 63 | 28.5% |
| No information/NA | 949 | 8.7% | 846 | 10.7% | 797 | 9.2% |

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009-11

Despite a significant drop in the number of high-cost loans between 2009 and 2010, the number rose between 2010 and 2011.

B. Real Estate Practices

1. Three Rivers Realtor Association

Information for this section of the AI was derived from an interview with representatives of Three Rivers Realtor Association.

Fair housing is a licensing component for realtors. A fair housing session is given during orientation and a DVD focusing on fair housing as it relates to disabilities is shown. While continuing education hours are required, no specific class related to fair housing is required for continuing education credits.

If a grievance is filed against an Association member, the complaint is presented to the Grievance Committee, whose membership will meet to review and discuss it. According to the Association, no complaints have been filed against the association in the last 15 months. Should a complaint occur, the association would most likely refer people to the Illinois Association of Realtors concerning possible ethics violations.

2. Joliet Regional Landlords Association

Information for this section of the AI was derived from an interview with representatives of the Joliet Regional Landlords Association (JRLA).

JRLA consists primarily of smaller landlords, each with 10 to 40 units under their management. Larger management firms do not belong to the organization. While Joliet is the central area for the association, members include landlords from other areas of Will County as well as some from outside of Will County. JRLA estimates that 25% of members are from outside of Joliet.

The association publishes five newsletters per year with new legal information and other news. In addition to the newsletter, JRLA provides training to members on various topics. Fair Housing has been a topic in recent years, and representatives of the association said additional fair housing training is always needed as new landlords enter the business and new laws are written.

C. Newspaper Advertising

Under federal law the making, printing, and publishing of advertisements that state a preference, limitation, or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin is prohibited. The prohibition applies to publishers, such as newspapers and directories. The prohibition also applies to persons and entities placing real estate advertisements.

Publishers and advertisers are responsible under federal law for making, printing, or publishing an advertisement that violates the Fair Housing Act on its face. Thus, they should not publish or cause to be published an advertisement that on its face expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

1. The Herald News

Publisher's Policy

For this AI, the Sunday November 4, 2012 and Sunday November 11, 2012 real estate sections of The Herald News were reviewed. The November 4th edition did include an equal housing opportunity banner which stated that "all real estate advertised in this newspaper is subject to the Federal Fair Housing Act" and further stated that it is illegal to advertise any preference for or against any of the protected classes. It also stated that the paper would not "knowingly accept any advertising for real estate which is in violation of the law." Furthermore, the paper gave contact information for housing centers that could assist persons who believe they may have been discriminated against.

Advertisement Reviews

Of the rental advertisements for apartments in Will County, eight stated "no pets" policies, including one advertisement that also stated this policy was "not negotiable." For some persons with disabilities, service animals and therapeutic pets are necessary to achieve independent lives. Specifically, these statements prohibiting or limiting pets discourage persons with disabilities that require service or therapeutic animals from applying for, or even inquiring about, these units. Discussions with the newspaper should be initiated with the recommendation that its policy be modified to require that all future rental real estate ads that state "no pets" (or seek to restrict the type of pet allowed) include the phrase: "except companion/service animals permitted under fair housing laws."

Three real estate advertisements in each week reviewed used the fair housing logo in their advertisements. None of those logos were of a size large enough to easily read the caption beneath the logo and none contained further information about the logo.



The Herald News is running ads that could be discriminatory for people with disabilities.

For people with disabilities who rely on service animals, rental ads limiting pets could discourage them from applying. To improve fair housing access, the newspaper should specify that service animals are permitted under fair housing laws.

2. Willfindhousing.org

The internet database accessible at www.willfindhousing.org was reviewed for the AI, specifically for questionable language in rental housing advertisements.

Advertisement Reviews

Restrictions and prohibitions on pets were commonly found in many ads. Numerous ads required pet deposits or renter's insurance with a pet. Some ads restricted the number or type of pet.

Because Will County actively promotes this website as a search engine for finding affordable rental housing, the County should require that the website post language informing landlords and rental agents of their publishing obligations in accordance with the Fair Housing Act. Discussions with the website owner should be initiated with the recommendation that its policy be modified to require that all future rental real estate ads that state “no pets” (or seek to restrict the type of pet allowed) include the phrase: “except companion/service animals permitted under fair housing laws.”



WillFindHousing.org is running ads that could be discriminatory for people with disabilities.

For people with disabilities who rely on service animals, rental ads limiting pets could discourage them from applying. To improve fair housing access, the website should specify that service animals are permitted under fair housing laws.

6. Evaluation of Current Fair Housing Profile

A. Fair Housing Policies and Actions since the Previous AI

Will County's last Analysis of Impediments to Fair Housing Choice was completed in 2005. The County reports progress on fair housing initiatives annually in its CAPER. The actionable issues identified in 2005 were:

- Limited public transit service after 6 PM
- Absence of on-going dialogue between public and private entities on fair housing issues
- Absence of an on-going collaboration between Will County, the City of Joliet and the City of Bolingbrook on fair housing issues
- Absence of a local point of contact to disseminate fair housing information and to respond to fair housing complaints
- Insufficient number of consumer education and credit counseling organizations in Will County

Since the last AI, the County has taken steps to address these issues and otherwise affirmatively further fair housing choice. These include, but are not limited to, the following:

- ✓ In 2008, the County implemented a "Fair Housing Clearinghouse" on its website, in order to educate County residents about fair housing laws. The site provides links to local, regional, and national fair housing resources and policies.
- ✓ The County continued networking with not-for-profit agencies that demonstrate the capacity to provide educational outreach for Will County citizens. To facilitate outreach, the County updates its "Fair Housing Clearinghouse" as part of the County's web page. The site links citizens to the various fair housing agencies in the Northern Illinois region and clearly defines the fair housing laws and the process to be used in the event fair housing rights are being violated.
- ✓ Funding provided from the HPRP program allowed the County and its HPRP subrecipient to create the www.WillFindHousing.org website. The purpose of the site is to help LMI persons and families find suitable, affordable housing options.
- ✓ The County networked with the City of Joliet and the Will County Center for Community Concerns, the Will-Grundy Center for Independent Living, and the Prairie State Legal Partnership in order to update and train staff on current AI trends in preparation for this analysis.
- ✓ Will County's recent comprehensive plan encourages local jurisdictions to mix land uses in the same area. Specifically, the plan calls for multi-family

uses to be included in a variety of residential neighborhoods. This type of development can be more affordable for low-income families, while providing easier access to services and amenities.

- ✓ The County's comprehensive plan included the 2030 Transportation Plan element. This Plan called for greater investment in transit, pedestrian, and bicycling facilities in addition to roadway improvements. Suggestions include improving rail connections both to downtown Chicago and between suburbs. It also suggests improving transit by adding bus routes and building transit centers.
- ✓ As part of the Will County CDBG and HOME applications, communities applying for funds must sign a fair housing agreement. This agreement states that subrecipients must be in compliance with all regulations, policies, guidelines and requirements regarding fair housing as a condition of receiving funding. Additionally, communities must take appropriate actions to overcome issues identified in the Analysis of Impediments to Fair Housing Choice.
- ✓ Will County worked with the City of Bolingbrook to create a mutually beneficial agreement regarding the County assuming Bolingbrook's CDBG entitlement grant. Bolingbrook will retain its entitlement grant amount for two years while the County administers the grant. After the agreement ends, Bolingbrook will relinquish its entitlement status, and its grant will be added to the Urban County's funds.

B. Advocacy Organizations

Several fair housing advocacy organizations serve the Urban County and its local jurisdictions. A summary of these is included below.

1. South Suburban Housing Center (SSHC)

South Suburban Housing Center (SSHC) is a regional fair housing enforcement and counseling agency that serves all of Will County. SSHC is a designated HUD fair housing enforcement agency. SSHC conducts periodic testing in the areas of real estate sales/new construction, rental management, mortgage lending, and homeowner's insurance. The organization also monitors new residential construction to ensure ADA compliance. In conjunction with the Will-Grundy Center for Independent Living, SSHC has hosted Fair Housing Awareness Seminars and other outreach activities for local landlords and citizens.

2. Will County Center for Community Concerns (WCCCC)

Will County Center for Community Concerns (WCCCC) is the County's Center for Community Action. WCCCC is also a HUD-certified housing counseling agency and serves as lead agency for the Will County Continuum of Care. The organization provides comprehensive housing and mortgage counseling on the topics of homebuyer education, credit, fair housing, and mortgage default/loss mitigation. WCCCC also participates in local landlord

training workshops, and advocates for the use of www.WillFindHousing.org, an online database of affordable housing options in Will County.

7. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in the Urban County. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

A. Demographic and Housing Market Observations

1. Population growth in Will County continues to significantly outpace statewide averages.
2. Racial minorities increased from 14.6% to 20.9% of the Urban County's total population between 2000 and 2010. Hispanics overtook Blacks as the largest minority group in the Urban County, growing 176.5% over the decade.
3. There are 47 areas of racial or minority concentration in the Urban County.
4. Will County is moderately segregated. According to dissimilarity index data, 53.7% of Black persons would have to move to a different location in order to achieve full integration.
5. Blacks and Hispanics experienced poverty at much higher rates than Whites and Asians in Will County in 2010. The median household income for Blacks and Hispanics was substantially lower than the median income for Whites and Asians. Blacks and Hispanics also had poverty rates exceeding 12%, compared to 4.7% for Whites and 7.0% for Asians.
6. Twenty-six areas of the Urban County include concentrations of both LMI persons and minorities. These racially/ethnically concentrated areas of poverty are located in Bolingbrook, Romeoville and Rockdale as well as the townships of Lockport, Joliet and Crete. Of the 26 areas, nine are areas of Black concentration, ten are areas of Hispanic concentration, and the remaining seven have both Black and Hispanic concentrations.
7. Four language groups in Will County have sufficiently large numbers of limited-English speakers to warrant further analysis of their access to Urban County programs and services. In Will County, there are more than 1,000 speakers of Spanish, Polish, Chinese and Tagalog that have limited proficiency in English.
8. The greatest growth in housing inventories occurred in the County's northern half, and mostly within municipalities.
9. Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites. Among minorities in the Urban County, 71.1% of Blacks and 84% of Hispanics were home owners compared to 90.1% of Whites.
10. Between 2000 and 2010, real median housing value increased 19.1% and median gross rent increased 7.9%, while median household income shrunk by 17%.
11. Reflecting national trends, median sales prices in Will County are significantly lower in 2012 than at the peak of the housing market. This provides lower-income buyers greater access to a range of housing, but may bring down the value of neighboring homes, negatively affecting existing homeowners in the area.
12. The increasing sales price as a percent of list price and lower average number of days on market signals a strengthening housing market in Will County.

13. Building permits for multi-family structures have decreased from a high of 474 in 2002 to a low of 12 in 2011. This could lead to a tightening of the rental market in Will County.

B. Observations Relative to Fair Housing Profile

1. Across Will County, race and familial status were the primary bases for fair housing complaints to the Illinois Department of Human Rights between 2005 and 2012. More than half of all fair housing complaints involved issues of race, familial status or both.

8. Impediments to Fair Housing Choice

A. Public Sector

1. **There is a need for greater collaboration among jurisdictions within Will County to identify and address impediments to fair housing choice.**

There are opportunities to create affordable housing in a dispersed manner outside of racially/ethnically concentrated areas of poverty both within the Urban County and local jurisdictions in Will County. Affirmatively furthering fair housing will entail a collaborative approach to affordable housing for all Will County residents wherever they choose to live. Such collaboration can address the deconcentration of poverty and segregated housing patterns where they now exist. It should be noted that areas with limited transportation options may not be appropriate target communities for increased affordable housing options without addressing access issues first. Transportation access is discussed more thoroughly in A.4.

Proposed Action Step: Convene a Fair Housing Summit annually among all units of local government in the County, including elected officials, city managers, city attorneys, department heads, etc. Invite South Suburban Housing Center to present educational workshops on appropriate topics.

Proposed Action Step: The County should continue to investigate the feasibility of assuming responsibility for HUD entitlement programs from the City of Joliet as it did for the City of Bolingbrook. At the least, the County should partner with the City of Joliet on joint eligible activities that are near the edge of the City and abut eligible County areas.

2. **Local units of government that participate in the Urban County's entitlement grant programs may not fully understand their responsibility to affirmatively further fair housing choice.**

Local units of government are required to affirmatively further fair housing as part of their acceptance of federal entitlement funds from the Urban County.

In reviewing local zoning ordinances during the AI, some were found to impose undue requirements or limitations on group homes. Other communities discourage compact, more affordable residential development by devoting the vast majority of land area to very large minimum lots for the development of single-family homes. In several communities, the zoning ordinance includes provisions for multi-family housing, but little or no undeveloped land is available for such uses. In one jurisdiction, multi-family housing developments were not permitted by right in any zoning district. All of these measures restrict fair housing choice.



Proposed Action Step: In addition to requiring AFFH certification, the County should require fair housing training as part of the application process for HOME and CDBG funds. Representatives of units of local government that are awarded entitlement funding should be required to participate in a fair housing training prior to receipt of funds.

Proposed Action Step: The County Land Use Department should create and promote model fair housing ordinance language, focusing on the removal of barriers to affordable housing and accommodating group homes for persons with disabilities. The model language should be presented and discussed at the fair housing training workshops for local units of government.

Proposed Action Step: The County should continue to require all CDBG and HOME local government recipients to certify that they will affirmatively further fair housing. Furthermore, the County should require each local unit of government recipient to provide written annual reports explaining how the jurisdiction carried out its AFFH obligations.

Proposed Action Step: The County should strengthen its Urban County opt-in agreement to require participating communities to have a fair housing ordinance in place before receipt of CDBG funding will be approved.

Proposed Action Step: The County should continue reviewing local municipal zoning ordinances each year until all are reviewed for compliance with fair housing laws.

Proposed Action Step: The County should adopt a policy of refusing to grant CDBG or HOME funds to jurisdictions that are determined to be engaging in unlawful discrimination, such as discriminatory zoning ordinances or discriminatory behavior involving land use approvals for multi-family housing developments or group homes for persons with disabilities.

3. **Some of the County's policy documents used by Will County in zoning and the administration of housing programs could be improved, from a fair housing perspective.**

Will County's obligation to affirmatively further fair housing means reviewing how County policies affect housing choice, whether explicitly or not. Documents governing housing policies were reviewed to ensure compliance with fair housing laws. Some of these documents could be improved to assist in furthering fair housing.

Proposed Action Step: Will County Land Use Department should evaluate the extent to which the Department's programs and services meet the needs of populations with limited English proficiency by conducting the four-factor analysis.¹⁰

Proposed Action Step: Future updates to Will County's comprehensive plan should include specific language that states the County's advocacy for a variety of housing types available for diverse households at a variety of income levels in a variety of locations throughout the County.

4. **Public transit is limited to the County's more densely developed areas. Residents of rural townships in the southern region are especially isolated from service, due to the financial infeasibility of extending routes to sparsely developed areas.**

Twenty-six of 62 jurisdictions in Will County do not receive regular service from a large, fixed-route transit provider. While this arrangement is understandable from a transportation management perspective, it has the effect of restricting fair housing choice to only those areas where transit services is available. The lack of transit service in these southern communities presents a barrier to the development of affordable housing opportunities.

Proposed Action Step: The County should continue to collaborate with RTA to promote the expansion of public transit service in high growth and high-job areas of the County, and outside of racially/ethnically concentrated areas of poverty. This could include the creation of ride-to-work public transit routes that consider the needs of second shift workers.

Proposed Action Step: The County's comprehensive plan calls for new investments in public transit, including new bus rapid transit routes within Will County and new

¹⁰ The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

commuter rail. These lines should be pursued and constructed as funding becomes available.

Proposed Action Step: Transit-oriented developments along public transit routes would provide the ideal opportunity to incentivize the provision of affordable housing for members of the protected classes. The County should consider the creation, promotion and adoption of an inclusionary housing ordinance that would require the set-aside of a specific percentage of housing units affordable to LMI households. As an alternative, higher density housing along major corridors served by transit could also increase affordable housing opportunities in appropriate locations. In collaboration with RTA, the County should identify major transit corridors where higher density housing could be developed.

Proposed Action Step: The County should collaborate with Pace to provide transit services to new developments as they occur.

5. Evidence demonstrates that some discrimination is present in the sale and rental of housing across Will County, especially on the bases of race, familial status and disability.

Across Will County, race and familial status were the primary bases for fair housing complaints to the Illinois Department of Human Rights, accounting for more than half of all fair housing complaints.

Proposed Action Step: The County should enhance its www.WillFindHousing.org website to include a strong fair housing component. General information on fair housing; examples of discriminatory actions; how to file a complaint; how to contact HUD, the Illinois Department of Human Rights, and the South Suburban Housing Center; etc. should be provided.

6. Will County does not have a countywide, comprehensive fair housing network that can adequately educate the public on fair housing issues, and accept and investigate fair housing complaints.

Will County has a variety of organizations working to further fair housing goals in the County. Despite the work of these groups, a single organization and point of contact for fair housing outreach, education and investigation would greatly enhance and expand fair housing choice.

Proposed Action Step: The County should adopt a fair housing ordinance and create a fair housing commission. Initially, the commission should be granted the power to provide fair housing education and outreach throughout Will County. As the commission becomes more experienced, the County should consider broadening its authority to include enforcement powers.

Proposed Action Step: The County should allocate 0.5%-1.0% of its annual CDBG allocation for pure fair housing activities such as education, outreach, enforcement and testing. Local qualified HUD-certified fair housing organizations could be contracted to provide such services.

7. Affordable housing, public housing and Section 8 voucher holders are generally concentrated within the City of Joliet and in racially/ethnically concentrated areas of poverty.

No public housing units are located within Will County, outside the entitlement communities of Joliet, Aurora and Naperville. Most other publicly or privately assisted affordable housing is located in the City of Joliet or in racially/ethnically concentrated areas of poverty.

Additionally, many Section 8 voucher holders are located in census tracts surrounding the City of Joliet and are generally located in the northern half of the County. This concentration of voucher holders demonstrates that affordable housing choice is limited geographically.

Proposed Action Step: The County should initiate a rental housing inspection program in the Urban County to upgrade and preserve the rental housing stock, similar to the program in place in Joliet. As part of the rental certification and licensing requirements, landlords should be required to complete fair housing training.

8. Housing, including public housing, is generally difficult for people with disabilities to find with or without reasonable accommodation.

For persons with disabilities, the housing market is especially tight in Will County. According to advocacy organizations, the rental housing units that are available, affordable and accessible to people with disabilities are very limited.

Persons with disabilities were almost twice as likely to live in poverty as persons without disabilities. Among all Will County residents with a disability in 2010, 10.2% lived in poverty, compared to 5.7% of persons without disabilities. Persons with disabilities are concentrated in larger, entitlement and opt-out communities, likely a function of the location of public and human services.

In addition, the Housing Authority of Joliet is not in full compliance with the Section 504 accessibility requirements. Of the 989 public housing units, 4.45% are mobility-accessible, 1.11% are sensory-accessible, and 5.16% are both sensory and mobility-accessible. Similarly, Aurora Housing Authority must complete a new Section 504 assessment to evaluate its current accessibility needs.

Proposed Action Step: The Housing Authority of Joliet should implement the recommendations outlined in its Section 504 Needs Assessment and Transition Plan.

Proposed Action Step: Aurora Housing Authority should develop a new Section 504 Needs Assessment and Transition Plan as indicated in its recent AI.

Proposed Action Step: The Housing Authority of Joliet should collaborate with local advocacy organizations that can assist persons with disabilities who are threatened with eviction for reasons related to their disabilities.

Proposed Action Step: The Will County building office should continue its inspections of new multi-family construction to ensure compliance with accessibility and design requirements.

B. Private Sector

1. **Mortgage lending data from 2009 to 2011 suggests that minority applicants are more likely to experience loan denial or high-cost loan rates than White applicants.**

In all three years studied, the loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants.

Upper-income minority households consistently experienced denial rates that were significantly higher than those of *lower-income* White households. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

Minority households, particularly those that are lower-income, were disproportionately represented among recipients of high-cost mortgage loans. This trend places minority homeowners at greater risk for eviction, foreclosure and bankruptcy.

Proposed Action Step: The County should continue to fund housing counselors to provide credit repair advice to expand opportunities for families with poor credit history, ensuring that members of the protected classes have access to means of improving their

ability to obtain and maintain decent, affordable housing.

2. Local rental advertisements that prohibit pets in housing may discourage people with disabilities from seeking certain units.

The real estate section in *The Herald News* and on www.WillFindHousing.org included advertisements prohibiting or restricting pets. For some persons with disabilities, service animals and therapeutic pets are necessary to achieve independent lives. Statements prohibiting or limiting pets discourage persons with disabilities that require service or therapeutic animals from applying for, or even inquiring about, these units.

Proposed Action Step: The County should provide a copy of the AI and recommend in writing to *The Herald News* that it modify its policy regarding rental real estate ads stating “no pets” or ads that seek to restrict or prohibit the types of pets allowed. The newspaper should amend its policy to include the phrase “except companion/service animals permitted under fair housing laws.”

Proposed Action Step: The County should revise the WillFindHousing.org website to include the phrase “except companion/service animals permitted under fair housing laws” in its policy for all advertisements that state “no pets” or ads that seek to restrict or prohibit the types of pets allowed.

3. Landlords may not be receiving adequate fair housing information when entering the business or through continuing education services.

Landlords are important stakeholders in providing fair housing choice to members of the protected classes. Additional fair housing education opportunities provided by the County and other qualified entities may better equip these groups with the knowledge and understanding needed to provide fair housing choice to members of the protected classes.

Proposed Action Step: The County should continue to collaborate with the Joliet Regional Landlord Association to include information or links on its website and in informational packets concerning fair housing laws and regulations for landlords. This initiative may involve a partnership with the City of Joliet to carry out similar activities.

9. Fair Housing Action Plan

| Goal | Strategies to Meet Goals | Responsible Entities | Benchmarks | Proposed Year of Completion | Proposed Investment | Date Completed |
|---|--|--------------------------------------|--|-----------------------------|---------------------|----------------|
| Impediment #1: There is a need for greater cooperation among jurisdictions within Will County to identify and address impediments to fair housing choice. | | | | | | |
| Work with entitlement communities in Will County on joint projects. | I. Convene an annual Fair Housing Summit. | Will County Land Use | Conducted Fair Housing Summit | | \$0 | |
| | II. Investigate the feasibility of assuming responsibility for HUD entitlement programs from the City of Joliet, or partnering on joint eligible activities. | Will County Land Use | Completed joint projects | | (to be determined) | |
| Impediment #2: Local units of government that participate in the Urban County's entitlement grant programs may not fully understand their responsibility to affirmatively further fair housing choice. | | | | | | |
| Work with communities to explain their rights and responsibilities regarding fair housing laws. | I. Require fair housing training as part of the application process for HOME and CDBG funds. | Will County Land Use, Diversity Inc. | Fair housing training for grant applicants | | (to be determined) | |
| | II. Create and promote model ordinances, especially as they relate to the removal of barriers to affordable housing and accommodating group homes for persons with disabilities. | Will County Land Use | A model ordinance | | (to be determined) | |
| | III. Continue to require all CDBG and HOME recipients to certify that they will affirmatively further fair housing. | Will County Land Use | Signed certifications | | \$0 | |
| Ensure that the County upholds its certification to affirmatively further fair housing. | I. Strengthen the County's opt-in agreement by requiring communities to have a fair housing ordinance. | Will County Land Use | Updated opt-in agreements | | \$0 | |
| | II. Continue reviewing local zoning ordinances for compliance with fair housing laws. | Will County Land Use | Reviewed zoning ordinances | | \$0 | |

| Goal | Strategies to Meet Goals | Responsible Entities | Benchmarks | Proposed Year of Completion | Proposed Investment | Date Completed |
|---|---|-----------------------------------|--|-----------------------------|---------------------|----------------|
| | III. Adopt a policy of refusing to grant CDBG and HOME funds to municipalities that are determined to be engaging in unlawful discrimination, such as through zoning codes in violation of fair housing laws. | Will County Land Use | Written policy concerning grant refusal | | \$0 | |
| Impediment #3: Some of the policy documents used by Will County in zoning and the administration of housing programs could be improved, from a fair housing perspective. | | | | | | |
| Ensure that the County's policies for language accessibility reflect HUD LEP guidance. | I. Evaluate the extent to which County programs and services meet the needs of populations with limited English proficiency by conducting the four-factor analysis | Will County Land Use | Completion of Analysis | | \$5,000 | |
| Adopt changes to zoning and land use-related documents aimed at improving opportunities for the protected classes. | I. Updates to Will County's comprehensive plan should include specific language stating advocacy for a variety of housing types available for diverse households at a variety of income levels. | Will County Land Use | Updated land use plan | | (to be determined) | |
| Impediment #4: Public transit is limited to the County's more densely developed areas. | | | | | | |
| Provide connections between transit-dependent members of the protected classes and areas of opportunities. | I. Continue to collaborate with RTA to promote the expansion of public transit service in non-impacted, high growth and high-job areas of the County. | Will County Land Use, RTA | Influence reflected in transportation planning, consideration of expansion in ride-to-work routes. | | \$1 million | |
| | II. Pursue and construct proposed bus rapid transit and commuter rail routes. | Will County Land Use, Pace, Metra | New routes added or constructed | | (to be determined) | |

| Goal | Strategies to Meet Goals | Responsible Entities | Benchmarks | Proposed Year of Completion | Proposed Investment | Date Completed |
|---|--|--|---|-----------------------------|-------------------------------|----------------|
| | III. Consider the creation, promotion and adoption of an inclusionary housing ordinance that would require the set-aside of a specific percentage of housing units affordable to LMI households, specifically in areas of high transit access. | Will County Land Use, Local Municipalities | Proposals for transit-oriented development with affordable housing components | Ongoing | \$0 | |
| | IV. Collaborate with Pace to provide transit services to new developments as they occur. | Will County Land Use, Pace | New routes added | Ongoing | (to be determined) | |
| Impediment #5: Evidence demonstrates that some discrimination is present in the sale and rental of housing across Will County, especially on the bases of race, familial status and disability. | | | | | | |
| Improve the availability of fair housing information. | I. Enhance the www.WillFindHousing.org website to include a strong fair housing component. General information on fair housing; examples of discriminatory actions; how to file a complaint; how to contact HUD; etc., should be provided | Will County Land Use, Advocacy Organizations | Complaints filed | | \$0 | |
| Impediment #6: Will County does not have a county-wide, comprehensive fair housing network that can adequately educate the public on fair housing issues, accept fair housing complaints and process them. | | | | | | |
| Lay the groundwork for a comprehensive fair housing network. | I. Pass a fair housing ordinance creating a board or commission that is responsible for education and outreach and is funded through County CDBG funds. | Will County Land Use | Fair housing ordinance | | \$0 | |
| | II. Create a specific line item in the annual CDBG budget for pure fair housing activities. | Will County Land Use | Budget line item | | 1% of total entitlement funds | |
| Impediment #7: Affordable housing, public housing and Section 8 voucher holders are generally concentrated within the City of Joliet and in racially concentrated areas of poverty. | | | | | | |
| Upgrade and preserve the existing housing stock. | I. Undertake a rental housing inspection program to upgrade and preserve the rental housing stock. | Will County Land Use | Rental housing inspection program undertaken | | (to be determined) | |

| Goal | Strategies to Meet Goals | Responsible Entities | Benchmarks | Proposed Year of Completion | Proposed Investment | Date Completed |
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| Impediment #8: Housing, including public housing, is generally difficult for people with disabilities to find with or without reasonable accommodation. | | | | | | |
| Improve the accessibility of public and private dwellings for people with disabilities. | I. Implement the recommendations outlined in HAJ's Section 504 Needs Assessment and Transition Plan. | Housing Authority of Joliet | Number of units made accessible | | \$1.8 million | |
| | II. Complete a Section 504 Needs Assessment and Transition Plan for AHA properties. | Aurora Housing Authority | Completed Section 504 Needs Assessment and Transition Plan | | (to be determined) | |
| | III. Collaborate with local advocacy organizations that can assist persons with disabilities who are threatened with eviction for reasons related to their disabilities. | Housing Authority of Joliet, Will-Grundy Center for Independent Living, South Suburban Housing Center | Review HAJ policy | | \$0 | |
| | IV. Continue to inspect new construction to ensure compliance with accessibility requirements. | Will County Land Use | Continued inspections | | \$0 | |
| Impediment #9: Mortgage lending data from 2009 to 2011 suggests that racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants. | | | | | | |
| Ensure that members of the protected classes have access to the means of improving their ability to obtain decent, affordable housing. | Continue to fund housing counselors to provide credit repair advice that expands opportunities for families with poor credit history. | Will County Land Use | Number of persons served | | \$30,000 | |
| Impediment #10: Local rental advertisements that prohibit pets in rental housing may discourage people with disabilities from seeking certain unit. | | | | | | |

| Goal | Strategies to Meet Goals | Responsible Entities | Benchmarks | Proposed Year of Completion | Proposed Investment | Date Completed |
|--|--|--------------------------------------|---------------------------------------|-----------------------------|---------------------|----------------|
| Eliminate language referencing restrictions on pets in rental units. | I. Recommend in writing to <i>The Herald News</i> that rental real estate ads stating “no pets” or ads that seek to restrict or prohibit the types of pets allowed include the phrase “except companion/service animals permitted under fair housing laws.” | Will County Land Use | Revised newspaper policy | | \$0 | |
| | II. Work with local contacts at the WillFindHousing.org website to include the phrase “except companion/service animals permitted under fair housing laws” for all advertisements that state “no pets” or ads that seek to restrict or prohibit the types of pets allowed. | Will County Land Use | Revised online advertisements | | \$0 | |
| Impediment #11: Landlords and realtors are not receiving enough fair housing information when entering the business or through continuing education services. | | | | | | |
| Educate landlords and realtors about their responsibilities related to fair housing laws. | I. The Joliet Regional Landlord Association should include information or links on its website and in informational packets concerning fair housing laws and regulations for landlords. | Joliet Regional Landlord Association | Information on website and in packets | | \$0 | |

10. Signature Page for the Urban County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Will County is in compliance with the intent and directives of the regulations of the Community Development Block Grant program.

(Signature of Authorizing Official)

Date